

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

DAE EEK CHO, :
 :
 Plaintiff, :
 :
 vs. : CA NO.: 5:13-CV-153 (MTT)
 :
 UNITED STATES OF AMERICA, :
 :
 Defendant. :

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

EDWARD LAMAR BLOODWORTH, :
 :
 Plaintiff, :
 :
 vs. : CA NO.: 5:23-CV-112 (MTT)
 :
 UNITED STATES OF AMERICA, FEDERAL :
 PROTECTIVE SERVICES, ET AL., :
 :
 Defendants. :

MACON, GEORGIA 9:50 A.M. DECEMBER 20, 2013

The deposition of DAE EEK CHO is being taken by the
Defendants; testimony is being given before Janice B. Keene,
Georgia Certified Court Reporter B-2336, in the United States
Federal Courthouse, 475 Mulberry Street, 3rd Floor, Macon,
Georgia, on December 20, 2013, beginning at approximately
9:50 a.m.

APPEARANCES:

For the Plaintiff:

Pro Se

For the Defendants:

MS. SHEETUL WALL
U.S. Attorney's Office
1246 First Avenue
SunTrust Building, 3rd Floor
Columbus, Georgia 31901

Also Present: Interpreter-Jason Lee
Edward Lamar Bloodworth

1 STIPULATIONS:

2 MS. WALL: We are here today in the matter of
3 *Bloodworth versus United States* and in the matter of
4 *Cho versus United States*, who is the Plaintiff in
5 that case. Ms. Cho is the spouse of the Plaintiff in
6 *Bloodworth versus United States*. This deposition is
7 being taken pursuant to court order in both cases.

8 -----

DAE EEK CHO

having first been duly sworn by the

court reporter, testified on

CROSS-EXAMINATION

BY MS. WALL:

Q I'm marking Exhibit 1 the judge's order in
Bloodworth. Ms. Cho, did you see that order?

A Yes.

Q And I'm going to mark as Exhibit 1-A the judge's
order in the *Cho* matter requiring Ms. Cho to appear for her
deposition today. Ms. Cho, did you recall seeing that order?

A This is the first time I'm seeing it today, yes.

Q Do you understand that that is an order that Judge
Treadwell --

A (In English) Yeah.

Q -- issued in your case?

A (In English) Yeah.

THE INTERPRETER: A Yes.

MS. WALL: Let me be clear, just so that we
know who all is present today. Today we have present
Ms. Cho, as the witness. And Mr. Lee -- would you
state your name --

THE INTERPRETER: Jason Lee.

MS. WALL: -- as the interpreter for the
Korean language. And we have Ms. Cho's husband, Mr.

1 Edward Bloodworth, present. I'm going to request
2 that Ms. Cho let you ask the question and let you
3 answer the question on her behalf to make sure there
4 is no error in translation.

5 THE WITNESS: Okay.

6 MS. WALL: I'm also going to ask that Mr.
7 Bloodworth follow the judge's order and remain silent
8 throughout the deposition, and as ordered by Judge
9 Treadwell, no objection will be waived in this
10 deposition. Therefore, no objection needs to be made
11 during the procedure.

12 And I'm going to request that Mr. Bloodworth
13 remain quiet throughout the deposition, including any
14 noises that could be disruptive.

15 MS. WALL: Q Ms. Cho, are you represented by
16 an attorney?

17 A We are -- we are trying to hire one.

18 Q You do not have an attorney right now; correct?

19 A (In English) No.

20 THE INTERPRETER: A No.

21 MS. WALL: Q Ms. Cho, we have an interpreter
22 here because you requested one; correct?

23 A That's right.

24 Q And Ms. Cho, you did not appear for your deposition
25 in which you were subpoenaed to appear on November 14th, 2013;

1 correct?

2 A That's correct.

3 Q And why did you not appear?

4 A (In English) This was solely my decision.

5 MS. WALL: I'm sorry. Please instruct the
6 witness to speak through the interpreter to make
7 sure --

8 THE WITNESS: A We had a change in plan.

9 MS. WALL: Q Who is "we?"

10 THE WITNESS: A (In English) I'm sorry. I --
11 I changed the --

12 THE INTERPRETER: A I changed the plan.

13 MS. WALL: Q You changed the plan to --

14 A (In English) But I'm sorry for that. It was -- I'm
15 -- I'm sorry for that. I regret that I didn't --

16 THE INTERPRETER: A I regret that I didn't
17 appear that day, and I am sorry about it.

18 MS. WALL: Q Okay. But were you ill?

19 A No.

20 Q Were you in jail?

21 A (In English) No.

22 THE INTERPRETER: A No.

23 THE WITNESS: (In English) Sorry.

24 MS. WALL: Q So before we get started with our
25 questioning, I want to instruct you on just making sure that

1 your answers are verbal so that the interpreter is not looking
2 at you shaking your head yes or no to make sure that our court
3 reporter can take down everything that is being said.

4 A Okay.

5 Q Have you ever given a deposition before?

6 A This is the first time.

7 Q Okay. Did you understand Judge Treadwell's
8 instructions about the deposition?

9 (MR. BLOODWORTH TAPPING PEN ON TABLE)

10 MS. WALL: Please stop.

11 THE WITNESS: A (In English) Yeah.

12 THE INTERPRETER: A Yes.

13 MS. WALL: Q Okay. I'm going to request that
14 you let me finish my question completely before you start an
15 answer.

16 A Okay.

17 Q And if you don't understand a question, please ask me
18 to clarify.

19 A Okay.

20 Q Please state your full name and spell it.

21 A (In English) D-a-e E-e-k C-h-o.

22 Q Have you ever used any other names?

23 A They call me Stephanie at home.

24 Q How do you spell Stephanie?

25 A (In English) S-t-e-p-h-a-n-i-e.

1 Q And when you say "they call me Stephanie at home,"
2 who is "they?"

3 A (In English) Husband, husband and friends and church
4 people, friends and everybody, I'm an American. I -- I married
5 my husband, you know. I've got to have some (inaudible) --
6 husband and everybody call me Stephanie.

7 Q Ms. Cho, I understand what you just said, but I want
8 to make sure that you go through the interpreter.

9 A (In English) Oh, I'm sorry.

10 Q It's okay. We'll keep practicing. We'll get it. We
11 just have to keep practicing.

12 A (In English) Not used to (inaudible) -- I think -- of
13 course. I'm sorry. We not used to that. You understand that?
14 You understand that?

15 Q If you don't need the interpreter --

16 A (In English) I need --

17 Q -- we don't --

18 A (In English) I need (inaudible) to this deposition
19 correctly.

20 Q So I will tell you that the last time when you did
21 not show up we paid Mr. Lee a lot of money to wait for you.
22 And for today for Mr. Lee to be here, we're paying a lot of
23 money. If you don't need him, let's let him go.

24 A I do need him.

25 Q Okay. Have you ever used Bloodworth for a last name?

1 A (In English) Mr. Bloodworth, not -- I wanted to
2 change my last name to -- I'm --

3 THE INTERPRETER: A Since my husband's last
4 name is Bloodworth, people do call me Mrs. Bloodworth, so I let
5 -- I let them call me, if they wish.

6 MS. WALL: Q Sure. You've never officially
7 used Bloodworth as a last name?

8 A That's correct.

9 Q How old are you?

10 A 48.

11 Q What's your date of birth?

12 A (In English) [REDACTED]

13 MS. WALL: I got that --

14 THE INTERPRETER: Okay.

15 MS. WALL: -- [REDACTED]

16 THE INTERPRETER: Yeah.

17 MS. WALL: Q Have you ever used any other date
18 of birth?

19 A No.

20 Q Have you ever used [REDACTED]

21 A No.

22 Q What is your phone number?

23 A (In English) [REDACTED]

24 Q Is that your cell phone number?

25 A (In English) Yeah.

1 THE INTERPRETER: A Yes.

2 MS. WALL: Q Do you have a home phone?

3 A No.

4 Q Do you carry your cell phone with you?

5 A (In English) Yeah. Yeah.

6 THE INTERPRETER: A Yes.

7 MS. WALL: Q What is your address?

8 A (In English) Post office box (inaudible) --

9 MS. WALL: Please instruct the witness --

10 MS. WALL: Q Ms. Cho, you are not allowed to
11 speak to Mr. Bloodworth during your deposition.

12 A (In English) I don't remember post (inaudible) --
13 post box number.

14 THE INTERPRETER: A I don't remember the post
15 office box number.

16 THE WITNESS: A (In English) Sometimes I
17 forget it.

18 Q That's okay.

19 A (In English) I'm sorry.

20 Q What is your street address where you live?

21 A We are staying temporarily with a -- at a friend's
22 house, and I don't know the --

23 THE WITNESS: A (In English) And I don't know
24 the --

25 THE WITNESS: A -- address of that --

1 of that house.

2 MS. WALL: Q How long have you been staying
3 there?

4 A Five days.

5 Q And who is that friend?

6 A It's a church friend.

7 Q What is their names?

8 A (In English) David Peterson.

9 THE INTERPRETER: A David Peterson.

10 MS. WALL: Q Is that in Macon?

11 A (In English) Yeah.

12 THE INTERPRETER: A Yes.

13 MS. WALL: Q And before that, where did you
14 live?

15 A (In English) 1405 Fern Drive.

16 THE INTERPRETER: 1405 Fern Drive?

17 THE WITNESS: Fern.

18 THE INTERPRETER: Fern?

19 THE WITNESS: F-e-r-n D-r.

20 THE INTERPRETER: A 1405 Fern Drive.

21 MS. WALL: Q Is that in Macon?

22 A (In English) Yeah.

23 THE INTERPRETER: A Yes.

24 MS. WALL: Q And why did you leave or move
25 from 1405 Fern Drive?

1 A Because the lease was over.

2 Q And how long did you live at 1405 Fern Drive?

3 A (In English) About 15 month.

4 THE INTERPRETER: A About 15 months.

5 MS. WALL: Q So on November 8th, 2013, you
6 were living at 1405 Fern Drive; correct?

7 A That's right.

8 Q Where did you live before that?

9 A (In English) Adrian Apartments, Adrian.

10 THE INTERPRETER: A Adrian Apartments.

11 MS. WALL: Q What is that address?

12 A I don't know. I'm sorry. I don't remember. I'm
13 sorry.

14 Q Was that in Macon?

15 A (In English) Yeah.

16 THE INTERPRETER: A Yes.

17 MS. WALL: Q And do you remember any other
18 address besides 1405 Fern Drive that you have lived in the last
19 five years?

20 A Like I said, I don't remember the address of the
21 apartment, Adrian Complex. In Atlanta, in Duluth, there's a
22 townhome, Merry Stone Townhome, maybe 35 something, but I don't
23 know the -- I don't remember the address. Since my husband
24 takes care of all the bills and all the things that relate to a
25 mailing, I don't really remember the addresses. Only one I

1 remember is the recent one, which is the 1405 Fern Drive.

2 Q Have you ever lived at 1415 Bloomfield Road in Macon?

3 A We had stayed -- we had stayed there temporarily.

4 That's my friend -- my husband's friend's house. We stayed
5 there while we were looking for a house.

6 Q What's the name of the friend?

7 A (In English) Alton.

8 THE INTERPRETER: A Alton.

9 MS. WALL: Q Can you spell that?

10 A (In English) I -- I (inaudible) -- his name is Alton.
11 I don't know. I can't spell Alton.

12 THE INTERPRETER: A I can't spell it. I don't
13 know.

14 MS. WALL: Q What is his last name?

15 A I don't know.

16 Q How long did you stay there while you were looking
17 for a house?

18 A Four days.

19 Q Was that before the Fern Drive address?

20 A That's correct.

21 Q Have you ever lived at 1415 Bass Road in Macon?

22 A That's the address of our -- the church. And my --

23 it's the address of the church, whose pastor is my husband's

24 friend, and my husband helps him out and stays there, and the

25 mailings -- our mails get forwarded to there and so forth, and

1 my husband stays there while I'm on --

2 THE WITNESS: A (In English) Irwin County.

3 THE INTERPRETER: A Irwin County.

4 THE WITNESS: A (In English) Irwin County,
5 ten, 11 months (inaudible) --

6 MS. WALL: Q I'm sorry. I didn't understand
7 the response. My husband stays there while I what?

8 A While I was at Irwin County for 11 months, Irwin
9 County.

10 Q Okay. Does your mail still go there?

11 A No.

12 Q And did you say Irwin County, as in Irwin County
13 Detention Center?

14 A (In English) Yeah. Yeah.

15 THE INTERPRETER: A Yes.

16 MS. WALL: Q Did you ever live at 569 Myrtle
17 Trace Lane in Suwanee, Georgia?

18 A (In English) Yes, I did. Yeah. Yeah, yeah.

19 THE INTERPRETER: A Yes.

20 MS. WALL: Q When was that?

21 A I think about one year, in 2008, when I had the
22 breast cancer.

23 Q So in 2008, you were in Suwanee. What year was that
24 that you were at the Bloomfield Road address, your friend
25 Alton's house?

1 A Two years ago.

2 Q And what year was it that your husband lived at the
3 1415 Bass Road address?

4 A Two years ago when I was in Irwin County.

5 Q So would that be fair to say then that was 2011?

6 A (In English) Yes.

7 THE INTERPRETER: A That's correct.

8 MS. WALL: Q And the 1415 Bloomfield Road
9 address was that also in 2011?

10 A Two years ago after the Immigration trial was over
11 and I came back to Macon, yes, it was two years ago.

12 Q Before you were detained, what was your address? Let
13 me clarify. Before you were detained by ICE, what was your
14 address?

15 A It was a place in Spring Creek where -- right across
16 from the mall in Macon, but I don't remember the address.

17 Q What year was that?

18 A I think that was like two and a half or three years
19 ago that we were there at Spring Creek.

20 Q Have you ever lived at 3750 Avon Road in Macon?

21 A I don't remember.

22 Q Have you ever lived at 1900 Riverside Drive,
23 Apartment 1100 in Macon?

24 A (In English) Yes, that's Spring Creek. That's Spring
25 Creek, 1900. Yeah, that is Spring Creek, 1900. I remember

1 this, 1900 Spring Creek.

2 Q So I understand the answer to be that Spring Creek
3 address is 1900 Riverside Drive.

4 A (In English) Yeah.

5 THE INTERPRETER: A That's correct.

6 MS. WALL: Q Have you ever lived at 1900
7 Wesleyan Drive, Apartment 1101?

8 A This is the address for the apartment building in
9 Spring Creek. The name of the apartment complex is Falls --
10 the name of the apartment complex is Falls at Spring Creek, and
11 the 1101 is the number or the address of the building, I think.

12 Q So did you ever live in an apartment number 1100?

13 A Yes, we lived at apartment number 1100, and I think
14 the other one was the number of the building.

15 Q Have you ever lived in an apartment number 1101?

16 A I think it was 1101, not 1100, that we lived in.

17 Q Have you ever lived at 1337 Joycliff Road, Apartment
18 80?

19 A I don't remember that at all.

20 Q Do you remember 1339 Joycliff Road, Apartment 80?

21 A I don't remember. I think this address, Apartment
22 No. 80 -- I think this -- I think this address with the number
23 80 that's the house for my father-in-law or my mother-in-law
24 and my brother-in-law. They live -- I think that's their
25 address, and that's very far away. I don't think it's even in

1 Bibb County.

2 A (In English) I'm not sure 100 percent, but I -- yeah.

3 Q So it's not in Macon?

4 A It's Macon, but it's not north -- but it's not north
5 Macon. It's east Macon, maybe a lot deeper than east Macon.

6 Q Before you lived in Spring Creek, where did you live?

7 A In Atlanta, in Suwanee.

8 Q Did you ever live in Hawaii?

9 A (In English) Yeah.

10 THE INTERPRETER: A Yes.

11 MS. WALL: Q When was that?

12 A I got married in Hawaii in 2001. I met my husband in
13 Hawaii in 2001, and -- and I go there -- I go there often,
14 maybe every once other year.

15 Q When did you live there? Was it more than just the
16 2001?

17 A I lived there for three months in 2001, around May or
18 June, and I have a lot of friends there, and that's when I met
19 my husband, as well.

20 Q And when was the last time you visited Hawaii?

21 A Let me think. I think I went there -- I think I went
22 there in January of 2010.

23 Q Did you go by yourself?

24 A Yes.

25 Q Other than three to four months from May or June

1 until September or so of 2001, did you ever live in Hawaii?

2 A Could you repeat the question?

3 Q It might be easier if you repeat to me the months
4 that you lived in Hawaii.

5 A I was -- I was in Hawaii in 2006 for two and a half
6 months to reapply for my green card, and then I came back to
7 New York.

8 Q In 2001, you lived there for three to four months;
9 correct?

10 A Yes.

11 Q What months of the year was that?

12 A I think maybe July, August and September. That's
13 right.

14 Q And then from 2001 to 2006, where did you live?

15 A I lived in New York City.

16 Q And then what two and a half months in 2006 did you
17 live in Hawaii?

18 A I think it was around January because it was
19 wintertime, Christmas and January.

20 Q Did you live by yourself?

21 A No, with friends because I had a lot of friends
22 there.

23 Q Where was your husband living when you were living in
24 Hawaii for two and a half months?

25 A He was in the New York apartment.

1 Q When you lived in Hawaii in 2001, did you live by
2 yourself?

3 A I had an apartment, and I met my husband there, and
4 we got married when we came back to New York -- I came to New
5 York. Right away. Right away.

6 Q So did you live by yourself when you lived in Hawaii
7 in 2001?

8 A I did, but my husband came to visit very often.
9 Actually, this is my husband's apartment. Actually, this is my
10 husband's apartment, and it was in Waikiki, Hawaii, and we
11 didn't live together because we hadn't yet gotten married.

12 Q Where did you live at the time that you met your
13 husband?

14 A I lived at a friend's house near Waikiki.

15 Q Where did you live before 2001?

16 A In New York, it was -- that was before we got
17 married.

18 Q Where did you live before you met your husband?

19 A New York and I met my husband in Hawaii, dated him
20 for three months. We came back to New York together and got
21 married in New York. It was right after 9/11/2001.

22 Q Do you have any children?

23 A No.

24 Q Have you ever had any children?

25 A No, [REDACTED] [REDACTED]

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[REDACTED], [REDACTED]
[REDACTED].

Q I'm going to show you what I've marked as Defense Exhibit 8. Is that your handwriting?

A (In English) Yes, yes, yes. Yes, yes.

Q Yes, that's your --

A (In English) Yes.

Q Is this your signature on Page 4 of this document?

A (In English) Yes. Yes, yes.

Q If you would, look at Page 2, please. I'm sorry. Page 3. Please look at Page 3. Would you look at -- if you'll put it down, I'll show you. Can you read what this says right there, please?

A (In English) Yeah, I remember this is -- my daughter is six years old. Only she needs me. I want to make it up the time I lost from her changing the period and my [REDACTED]
[REDACTED].

Q Okay. Thank you.

MS. WALL: Would you interpret what she just said, please, and you're welcome to look at the document.

THE INTERPRETER: A My daughter is six years old. She needs me. I want to make it up, the time I lost from her changing their period and my [REDACTED].

MS. WALL: Q So who is this person you're

1 talking about in that paragraph?

2 A I thank you for pointing this out. When I was in
3 Irwin County Detention Center, there's a lot of Mexican-Spanish
4 inmates there, and they all have like six to seven kids, and it
5 is so -- I felt so out of place because I didn't have -- I
6 didn't have any kids. And they said -- they told me that I
7 should at least put one kid, or I should at least say to the
8 judge that I have at least one kid.

9 A (In English) I knew this was not right. I knew this
10 was not -- not right. When I say this, this is not true. When
11 I didn't say -- tell the truth to the judge, I know this is
12 wrong.

13 MS. WALL: I think I understood what
14 she just said, but I'm going to let you translate
15 that, please, Mr. Lee.

16 THE INTERPRETER: The interpreter will
17 have to have her talk in Korean to translate
18 because she's talking in English.

19 MS. WALL: Q Please talk in Korean so he can
20 translate.

21 THE WITNESS: (In English) I'm sorry.
22 Yeah.

23 THE WITNESS: A I -- I shouldn't lie to a most
24 honorable judge, but I was so jealous of those other ladies
25 with so many kids, and they said if I said to the judge that I

1 had at least one kid then he might look upon me -- upon my case
2 favorably. So I know I shouldn't have, and -- but I lied, and
3 I am very sorry about that.

4 MS. WALL: Q Can you turn to the first page of
5 this document, please? What is the date of your letter?

6 A It's July 8th, 2011.

7 Q And who are you addressing the letter?

8 A (In English) Judge Cassidy. Yeah, Judge Cassidy.

9 THE INTERPRETER: A Judge Cassidy.

10 MS. WALL: Q Judge Cassidy?

11 A Yes.

12 Q Okay. Go back to Page 3. Go back to the sentence
13 where you said my daughter is six years old and look at the
14 sentence right above it. Does that say I have been away from
15 my family for seven months, seven days now? Is that what that
16 says?

17 A (In English) Yeah. Yes, yes.

18 Q Please let the interpreter --

19 A Yes.

20 Q Okay. Please go to the last sentence in that same
21 paragraph that starts with I would love and read that, please?

22 A (In English) I would love for them to get to know
23 family, especially their granddaughter. Granddaughter.
24 Granddaughter.

25 Q And were you talking about your daughter that you

1 lied about?

2 A (In English) Yes, yes, yes. This is a -- I'm --

3 THE INTERPRETER: A Yes, that's correct, but I
4 did not make this up. It -- it -- a inmate there told me to
5 say this because she said that it'll help my case.

6 MS. WALL: Q Did the inmate lie to the judge
7 for you?

8 A The other detainee made this -- made this up for me
9 saying that this will help me.

10 Q Did you know you were lying to a judge?

11 A Yes, I was worried that -- whether this is right, and
12 I was worried what kind of problem this might cause later on
13 with the judge.

14 Q So without confusing it, let me ask a direct
15 question. Were you lying when you wrote in your letter to
16 Judge Cassidy that you had a daughter?

17 A Yes, yes, it was a lie, but at the time, I did have a
18 niece that was six years old, and I was away from that niece
19 for that many months. And the inmate there said that just say
20 that you have a daughter and that that would help your case.

21 Q I'm going to show you what I've marked as Defense
22 Exhibit 2. Is that a copy of your marriage license to Mr.
23 Bloodworth?

24 A (In English) Yeah.

25 THE INTERPRETER: A Yes.

1 MS. WALL: Q And does the date on that show
2 October 3rd, 2001?

3 A (In English) Yeah.

4 THE INTERPRETER: A Yes.

5 MS. WALL: Q Is the address 29, dash, 16 21st
6 Avenue, Apartment 6, Astoria, New York?

7 A Yes.

8 Q Was that the address that you were living at?

9 A Yes.

10 Q And that was the address that Mr. Bloodworth was
11 living at?

12 A (In English) Yes.

13 THE INTERPRETER: A Yes -- yes, because we
14 were married and there was a younger sibling living there, as
15 well.

16 MS. WALL: Q Whose younger sibling?

17 A My younger sibling.

18 Q And where is your younger sibling now?

19 A He -- he or she is in Seoul right now, Seoul, Korea,
20 temporarily. And at the time, he left the apartment, and after
21 leaving the apartment six months, he got married to somebody
22 that he was dating.

23 Q So was the sibling -- it was a brother; correct?

24 A It's a brother.

25 Q Did your brother get along with your husband?

1 A Yes, they got along very well in the beginning.

2 Q Were the police ever called for any arguments between
3 your brother and your husband?

4 A Yes. So we -- all of us came down to Atlanta and
5 lived at an apartment in Museum Tower in downtown Atlanta, and
6 because of the cultural difference, maybe, my brother and my
7 husband had an argument, and my husband pushed my brother and
8 he fell down, and my brother called the police.

9 Q Where was that, in Atlanta?

10 A (In English) Atlanta Museum Tower.

11 THE INTERPRETER: A Atlanta Museum Tower.

12 MS. WALL: Q When was that?

13 A Maybe 2003.

14 Q Where is your brother now? You said he's in Seoul?

15 A That's correct.

16 Q And you said he was in Seoul temporarily?

17 A (In English) Yeah.

18 THE INTERPRETER: A Yes.

19 MS. WALL: Q Where does he live permanently?

20 A Outside of Seoul, you talking about?

21 Q Does he live in the United States anywhere?

22 A Since they had a kid here in the U.S. but they're all
23 in Korea right now with his wife and my -- my nephew or niece.

24 Q What is your brother's name?

25 A (In English) Y -- Y -- Y-o-n-g.

1 THE INTERPRETER: A How do you spell Yong --

2 THE WITNESS: A (In English) Yong.

3 THE INTERPRETER: A -- Y-o-n-g?

4 THE WITNESS: A (In English) Y-o-n-g.

5 THE INTERPRETER: A Is that correct? Is that
6 correct?

7 THE WITNESS: A (In English) Yong.

8 MS. WALL: Q I would not know if it's correct
9 or not.

10 A (In English) Y -- Yong. Yong Eek Cho. His name is
11 Yong Eek Cho.

12 THE INTERPRETER: A His name is Young Eek Cho,
13 last name Cho.

14 MS. WALL: Q Have you and your husband ever
15 lived in separate homes since your marriage?

16 A Not once, not even once.

17 Q So when you were in Hawaii for two and a half to
18 three months, would you call that an extended visit to Hawaii?

19 A Yes, it's just -- yes, it's just an extended visit
20 because he likes me to visit Hawaii and hang out with my
21 friends once in a while. So it was a visit away from him. He
22 likes me to go to Hawaii during wintertime.

23 Q Are you currently employed?

24 A Not -- not with any company or anything.

25 Q Do you have a job?

1 A I'm a member of HCF Fashion Design -- Designer -- HCF
2 Fashion Designer member since 1996, and not only -- not only
3 that, but I'm a interior designer and professional decorator.
4 And since about two years ago, also I've been working as a
5 counselor at a big church, doing business counseling, worship
6 counseling and business counseling.

7 Q Are you currently employed by a church?

8 A They are asking me to come work for them, but I am
9 postponing it. I am very popular at the church.

10 MR. BLOODWORTH: Excuse me, Ms. Wall. May
11 we take a break for the restroom? Is that possible?

12 MS. WALL: You're welcome to come and go
13 whenever you want, Mr. Bloodworth.

14 MS. WALL: Q Ms. Cho --

15 A (In English) Yes?

16 Q -- are you currently receiving a paycheck?

17 A No, not at all.

18 Q Have you done any work for money as an interior
19 designer this year?

20 A No.

21 Q Last year?

22 A No.

23 Q When is the last time you were paid to do any work as
24 a fashion designer or an interior designer?

25 A I have not earned any income while I lived in the

1 U.S. because of my Immigration problem.

2 Q When did you come to the U.S.?

3 A 2009.

4 Q So is it fair to say that you have not earned any
5 income since 2009?

6 A I should have been making money related to these
7 professions but I cannot because they won't give me the green
8 card.

9 Q So my question is, and it's a yes or no answer, have
10 you earned any income since 2009?

11 A Since 2009?

12 Q When did you come --

13 A (In English) Okay.

14 Q -- to the United States?

15 A Well, in 2001 -- after 2001, I worked there as a
16 manager at a hair salon because I'm also a makeup artist.

17 Q Okay. So I'm going to --

18 A So we -- I would do makeups for brides with other
19 colleagues when there is weddings and stuff, but I couldn't do
20 a lot of that either because I didn't have a green card.

21 Q So I'm not getting an answer. Without an
22 explanation, first let's get a yes or a no. Since you came to
23 the United States, have you earned any income?

24 A I did not receive any kind of income personally, but
25 I did help my husband when he was running -- working as a

1 mortgage broker.

2 Q What year was that?

3 A That was after we got married so probably around
4 2003.

5 Q When did you come to the United States?

6 A I think it was 1999.

7 Q So from 1999 until 2003, you did not work anywhere?

8 A Only working as a hairstyle and makeup artist before
9 2003, just a couple times because I only worked one or two
10 times to go out to like a wedding to do bride's hair and
11 makeup, but I've never worked at a company because I didn't
12 have a green card.

13 Q Did you do that for free, or did you earn an income
14 for it?

15 A Yes, they paid me.

16 Q So I'm going to go back to something you said to
17 clarify for me. Are you currently unemployed, or are -- excuse
18 me. Are you currently unemployed, or are you currently
19 employed? Instruct -- just in a yes or a no and then we can go
20 further.

21 A No.

22 Q You are not employed?

23 A That's correct.

24 Q Do you earn an income or money in any way whatsoever
25 currently?

1 A I've worked as a -- I've tried working as a
2 dishwasher as a part time to pay -- to pay bills.

3 Q Who was -- where was that?

4 A (In English) A Japanese restaurant.

5 THE INTERPRETER: A Japanese restaurant here.

6 MS. WALL: Q What is the name?

7 A (In English) Taki. Taki.

8 THE INTERPRETER: A Taki near --

9 MS. WALL: Q How do you spell that?

10 A (In English) T-a-k-i.

11 Q Are you saying it's near Wal-Mart?

12 A Yes, it's -- Wal-Mart. Wal-Mart.

13 THE INTERPRETER: A Yes.

14 MS. WALL: Q In Macon?

15 A (In English) By Zebulon Road, Wal-Mart.

16 THE INTERPRETER: A By Zebulon Road, Wal-Mart.

17 THE WITNESS: A (In English) Wal-Mart.

18 MS. WALL: Q When did you work at that
19 Japanese restaurant?

20 A (In English) Let me see, about a couple of months
21 ago, not -- not over the month -- almost two month ago, almost,
22 I guess. Yeah.

23 Q And did they pay you by check?

24 A No. Cash.

25 Q And is that --

1 A It's a part-time job.

2 Q Other than the Japanese restaurant a couple of months
3 ago, have you worked anywhere else this year?

4 A (In English) No.

5 THE INTERPRETER: A No.

6 MS. WALL: Q So in 2013, how much money did
7 you earn?

8 A (In English) \$70.

9 THE INTERPRETER: A \$70.

10 THE WITNESS: A (In English) Only two days at
11 five, six hours.

12 THE INTERPRETER: A I only worked two --

13 THE WITNESS: A (In English) Ten hours, they
14 pay -- they pay \$7 an hour is about almost \$70.00 they pay,
15 about nine, ten hours, something like that.

16 MS. WALL: Q So you only worked for one day?

17 A (In English) Two days.

18 Q Other than two days at the Taki restaurant, have you
19 worked anywhere else or for anyone else in 2013?

20 A (In English) No.

21 THE INTERPRETER: A No.

22 MS. WALL: Q Who is the manager at Taki
23 restaurant?

24 A (In English) I don't remember his name, but -- I
25 don't remember his name.

1 Q Who would be someone's name that you remember at Taki
2 restaurant?

3 A (In English) Actually -- actually, I -- I don't
4 remember nobody -- anyone's name there.

5 THE INTERPRETER: A I don't remember anybody's
6 name there. I just did a interview with the manager, and he
7 paid me. That's -- that's it.

8 MS. WALL: Q Okay. Did you work anywhere in
9 2012?

10 A (In English) No.

11 THE INTERPRETER: A No.

12 MS. WALL: Q Does your husband work?

13 A Last year, he didn't. Last two years, he didn't.

14 Q So is he currently unemployed?

15 A That's correct.

16 Q And was he unemployed all of 2012?

17 A Last two years, he hasn't worked at all. Before
18 that, he used to do some landscaping, not for a company or
19 anything, but as a part time, do some landscaping, like
20 extending the driveways or making swimming pools or stuff like
21 that. But last two years, he did not work.

22 Q Okay. And in 2010, did he work?

23 A Yes, he worked, like I said, doing landscaping jobs
24 like expanding the driveway or making a swimming pool or
25 clearing the backyard of trees.

1 Q So that was in 2010; correct?

2 A Yes.

3 Q In two thousand when you -- strike that. When you
4 say two years ago, are you referring back to 2011?

5 A He did not work past two years, and -- but before
6 that, he worked on these things that I just mentioned.

7 Q Tell me what you mean by past two years. Do you mean
8 2011, 2012?

9 A There was -- I'm talking about when I was in
10 detention for the Immigration, so it's 2011, 2012.

11 Q That he did not work in 2011, 2012?

12 A That's correct.

13 Q And did he work in 2013?

14 A Not really, not really, no.

15 Q I'm going to show you what I've marked as Defense
16 Exhibit 9. Is that your handwriting?

17 A Yes.

18 Q Is that your signature on the second page?

19 A (In English) Yeah, yeah.

20 THE INTERPRETER: A Yes.

21 MS. WALL: Q And what is the date of that
22 letter?

23 A September 20, 2011.

24 Q And who is that letter addressed to?

25 A Judge Cassidy.

1 Q Was your husband -- did your husband have a job or
2 working -- let me make it clear. Strike that. Let me ask a
3 clear question. Was your husband working when you wrote this
4 letter to Judge Cassidy?

5 A No, he wasn't. This is a letter telling the judge
6 our history before I went into the detention center, the seven,
7 eight years before going into a detention center.

8 Q Okay. Please turn to Page 2. Do you see under your
9 signature where it says P.S.?

10 A (In English) Yes.

11 Q Did you write that?

12 A Yes.

13 Q Can you read out loud what that says?

14 A (In English) Yeah. I hope you like my husband's job
15 and experience. We depend on you. We -- and we love you.

16 Q So you were telling Judge Cassidy that you loved him?

17 A (In English) Yes, I -- I honor him, and I -- I fear
18 and honor him. I did all the time. But I didn't know -- yeah.
19 Yes. Yes. Yeah. I did really honor -- I really honor him,
20 and I was expecting some -- every court and the next court, the
21 next court, next court, I was expecting (inaudible) -- because
22 there is nothing too much with my (inaudible) -- so many months
23 I stayed. I'm sorry.

24 Q Ms. Cho, that's difficult to understand, so I'm going
25 to ask you, and if you don't mind, just let's answer through

1 the interpreter.

2 A (In English) Sorry. Apologize.

3 Q So my question is did you write that we depend on you
4 and we love you to Judge Cassidy?

5 A That's right.

6 Q Okay. And when you said "we," who were you referring
7 to?

8 A (In English) Husband -- sorry.

9 THE INTERPRETER: A Me and my husband.

10 MS. WALL: Q And that was in September of
11 2011; right?

12 A I think so.

13 Q Did you date it the day that -- did you date it
14 September 20th, 2011 at the top of the letter?

15 A Yes.

16 Q Also, on Page 2, you say that your husband is an
17 evangelist; right?

18 A (In English) Yeah, he -- he's got a minister
19 certificate. He has.

20 Q Does he work as a minister anywhere?

21 A (In English) Oh he -- oh I'm sorry.

22 THE INTERPRETER: A He used to but not now
23 because I think he is affected -- he has some kind of a anger
24 problem due to his parents getting a divorce and from the
25 trouble with his ex-wife. So ever since those -- those events,

1 he developed some kind of anger problems, so he doesn't work in
2 that profession. But now he's fine.

3 MS. WALL: Q Do you operate a business of any
4 type?

5 A No.

6 Q Have you ever been sued?

7 A No.

8 Q Other than this lawsuit, have you ever sued anyone?

9 A No.

10 Q Have you ever sued anyone? Are you still answering
11 that question?

12 A We're thinking -- we're thinking about suing this
13 company that did some -- took some stuff from our land in
14 Wilkinson County.

15 Q Who is "we?"

16 A (In English) Husband and I.

17 THE INTERPRETER: A My husband and I.

18 MS. WALL: Q And did this company take some of
19 your and your husband's land?

20 A (In English) Yes.

21 THE INTERPRETER: A Yes, in -- in our land,
22 there is some artifacts that are buried under the land, and
23 this company is coming at midnight and taking stuff, those
24 artifacts out, and stealing it. So we're having a lot of
25 problems, so we're thinking about suing them.

1 MS. WALL: Q What is the name of the company?

2 A (In English) Emorus.

3 THE INTERPRETER: A Emorus.

4 THE WITNESS: (In English) Emorus.

5 MS. WALL: Q Can you spell that for me?

6 A (In English) E-m-o-r-u-s, I guess. I'm not sure.

7 And B-S-F, another company, B-S-F.

8 MS. WALL: Just a minute. Let's go off the
9 record.

10 (OFF THE RECORD)

11 MS. WALL: Q You said Emorus and BSF is
12 the name of the company?

13 A Yes.

14 Q And is the land officially owned by you and your
15 husband?

16 A Yes.

17 Q Okay. And what is your name on that deed? Is it
18 Stephanie? Is it the other name or other -- in some other
19 third name?

20 A My name is not really on the title. The title has my
21 husband's name and my husband's father's name, but since my --
22 since the father has passed away, so it is ours.

23 Q So the title is only in your husband's name; correct?

24 A (In English) Yeah, yeah, yeah, yeah, yeah.

25 THE INTERPRETER: A That's right.

1 MS. WALL: Q Have you ever been married
2 before?

3 A No.

4 Q I'm going to ask you if you know a list of people;
5 okay?

6 MR. BLOODWORTH: Ma'am, we've been in for
7 two hours --

8 MS. WALL: Please -- you can leave anytime
9 you want, Mr. Bloodworth. Please don't interrupt
10 my deposition.

11 MR. BLOODWORTH: No --

12 MS. WALL: You are not to interrupt my
13 deposition.

14 MR. BLOODWORTH: -- I'm not interrupting your
15 deposition.

16 MS. WALL: Please stop talking.

17 MR. BLOODWORTH: Usually, we have a break --

18 MS. WALL: I'm sorry. I am conducting the
19 deposition.

20 MR. BLOODWORTH: Okay.

21 MS. WALL: You are free to leave, as you
22 wish.

23 MR. BLOODWORTH: Okay. I'll -- I'll take
24 a note of that; okay?

25 MS. WALL: Q So Ms. Cho, I'm going to ask you

1 if you know a list of people and you tell me if you do.

2 A (In English) Yeah.

3 Q Do you know someone by the name of Brian Bloodworth?

4 A (In English) Brian Bloodworth. Brian Bloodworth.

5 No. No, ma'am. I'm sorry.

6 Q Do you know someone by the name of Hee, H-e-e, C.,
7 the middle initial, last name Park, P-a-r-k?

8 A (In English) No.

9 THE INTERPRETER: A No.

10 MS. WALL: Q Do you know someone named
11 Jacqueline or Jackie Stephens?

12 A (In English) Yes. I heard of her, yes.

13 Q You've heard of her? Have you ever talked to her?

14 A No.

15 Q What do you know about her? Excuse me. Let me
16 strike that. How have you heard of her?

17 A She -- she is also suing the U.S.A. for same type of
18 case, and she talked to my husband regarding it. And she is
19 some kind of a professor of political science and doing some
20 kind of immigration research, and so I heard him talking to
21 her, and I also talked to her over the phone once.

22 Q What did you talk to her about?

23 A She wanted to know the processes that I had to go
24 through in Judge Cassidy's court for the Immigration case, and
25 also she wanted to know the processes and procedures that I had

1 to go through when I was being transported from the Irwin
2 County Detention Center to the Atlanta -- court in Atlanta.

3 Q Ms. Cho, we're going to take a break in about ten
4 minutes; okay?

5 A (In English) Thank you.

6 Q We'll take a lunch break.

7 A (In English) Thank you.

8 Q But as I told you when we first started --

9 A (In English) I'm sorry (inaudible) -- bother you, my
10 husband a little bit.

11 Q I'm sorry?

12 A (In English) I'm sorry. My husband a little bit
13 bothering (inaudible) -- I'm sorry.

14 Q Are you saying you're sorry about your husband
15 bothering me?

16 A (In English) A little bit, yeah, kind of was a little
17 bit. I hope --

18 Q No. But as I told you when we started, you can take
19 a break when you want to.

20 A (In English) Okay.

21 Q So if you can go another ten minutes, let's do that,
22 and then we'll break for lunch --

23 A (In English) Okay.

24 Q -- okay?

25 A (In English) Thank you. Thank you very much.

1 Q Have you ever seen anyone working for the government
2 touch your husband inappropriately?

3 A No.

4 Q Have you ever heard anyone working for the government
5 threaten your husband?

6 A No.

7 Q Have you ever heard of anyone talking about an FBI
8 investigation about your husband?

9 A The -- from what I hear from my husband, the ICE was
10 claiming that the -- my husband attacked them and terrorized
11 them, and because of that, ICE had contacted FBI and FBI
12 conducted an investigation to see if my husband committed any
13 terrorist act. And after they concluded the investigation, FBI
14 told ICE that -- and they just laughed at their accusation
15 saying the husband was mad because his wife was detained
16 without any just cause, and that's how the investigation ended.

17 Q So your knowledge of whether there was an FBI
18 investigation comes from your husband; correct?

19 A That's correct.

20 Q Has your husband ever tried to pass a note to you
21 during Immigration Court?

22 A No.

23 Q Have you ever seen your husband argue with any
24 government employee?

25 A (In English) No.

1 THE INTERPRETER: A No.

2 MS. WALL: Q Any police officer?

3 A (In English) No.

4 THE INTERPRETER: A No.

5 MS. WALL: Q Do you know if your husband had
6 any arguments with any of your Immigration lawyers?

7 A No.

8 Q Are you saying you don't know if he did, or are you
9 saying that he did not have any arguments with your Immigration
10 lawyers?

11 A I heard that he had an argument, but I did not see it
12 myself. I heard it from the case managers and other people.

13 Q You heard that your husband had an argument with your
14 lawyer; is that what you're saying?

15 A Deportation officer, I'm talking about the
16 deportation officer. I heard them talk.

17 Q Were they talking about your husband?

18 A (In English) Yeah.

19 THE INTERPRETER: A Yes.

20 MS. WALL: Q And were they talking about your
21 husband having an argument with your lawyer?

22 A I don't know about my lawyer, but he was arguing with
23 a case -- or not arguing, but he was very mad at the case
24 manager and the deportation officer because he had told them
25 that I needed to take my medication related to my [REDACTED]

1 [REDACTED], and -- but they would not give it to me. So he was --
2 he got really mad at the case manager and the deportation
3 officer. It's a very difficult -- difficult situation because,
4 you know, the -- his wife needs her medication, and they
5 weren't giving it to her.

6 Q Okay. Speaking of your [REDACTED] let me ask you do you
7 have any medical diagnoses right now?

8 A No.

9 Q Do you have a mental health diagnosis?

10 A No.

11 Q Have you ever -- other than [REDACTED], have you ever
12 been diagnosed with any other medical condition?

13 A No.

14 MS. WALL: So this deposition is taking a
15 lot longer than we expected, so we should probably
16 take a very quick break.

17 THE INTERPRETER: Okay.

18 MS. WALL: Q Ms. Cho, we're going to take a
19 very quick lunch break, and I'm going to ask that you not
20 discuss your testimony with anybody during the break --

21 A (In English) Okay.

22 Q -- which includes your husband. You are not to
23 get any guidance on how to answer any questions, and you're not
24 to discuss the testimony so far. Do you understand?

25 A (In English) Okay.

1 THE INTERPRETER: A Yes.

2 MS. WALL: So let's come back -- it's right
3 now -- by my watch, it's 11:30. How about we come
4 back at noon?

5 (LUNCH BREAK)

6 MS. WALL: Q Ms. Cho, we're back on the record
7 after lunch. And as I was saying before we went on break, this
8 deposition is taking longer than normally it would I believe
9 partly because we're using an interpreter, so every question
10 gets asked twice and every answer gets stated twice. So we'll
11 go until 5 o'clock today --

12 A (In English) Okay.

13 Q -- and then we will need to reconvene to finish if
14 we're not done.

15 A (In English) Okay.

16 THE INTERPRETER: A Okay.

17 MS. WALL: Q You gave me your phone number
18 already. Do you use an e-mail?

19 A (In English) I don't e-mail. I don't use. I'm so
20 sorry.

21 Q So other than your phone number and the P.O. box that
22 I have on your complaint, is there any other way to communicate
23 with you?

24 A That's right.

25 Q So to reschedule a date, I will call you on the phone

1 number you gave me.

2 A Okay.

3 Q What language do you and your husband speak at home?

4 A English.

5 Q If I called you and spoke to you on the phone to
6 schedule your deposition, could we -- could you communicate
7 with me in English to do that?

8 A Yes.

9 Q You are still under oath; right?

10 A (In English) Yeah.

11 Q So do you understand that the answers you just gave
12 me before I told you you were still under oath you were under
13 oath when we started back on the record?

14 A Yes.

15 Q Are you taking any medications today?

16 A No.

17 Q When is the last time you took any medications?

18 A The last time I took medication was when I was
19 detained in Irwin County, and I didn't need to take any
20 medications after that.

21 Q What medications were you taking while you were at
22 Irwin County?

23 A (In English) After the [REDACTED], you -- you --
24 the [REDACTED], you --

25 THE INTERPRETER: A I took [REDACTED] after the

1 [REDACTED] operation for that purpose.

2 MS. WALL: Q Can you spell that?

3 A I really don't know how to spell it. I just -- I
4 know it as [REDACTED].

5 Q Are you saying that to begin with the letter [REDACTED]

6 A I think it's [REDACTED].

7 Q How long after your [REDACTED] were you required to take
8 it?

9 A After the [REDACTED] I was
10 supposed to take it from two to three years.

11 Q When was your [REDACTED]

12 A I think September of 2009.

13 Q Did you take [REDACTED] after your
14 [REDACTED]?

15 A (In English) Yeah.

16 THE INTERPRETER: A Yes.

17 MS. WALL: Q When were you released from Irwin
18 County?

19 A (In English) 2011, February -- February -- I don't
20 remember.

21 THE INTERPRETER: A 2011, February sometime, I
22 don't remember.

23 MS. WALL: Q If I told you that an Immigration
24 judge adjusted your status in February of 2012, would you agree
25 with that? Does that sound right?

1 A When you say adjust the status, are you talking about
2 him giving me a green card?

3 Q If that's what you got. I don't know if he gave you
4 a green card but --

5 A (In English) Yeah, I got a green card.

6 Q I'm sorry?

7 A (In English) Is it -- yeah, I got a green card. Yes,
8 yes.

9 THE INTERPRETER: A Yes, I got a green card.

10 MS. WALL: Q When did the judge allow you to
11 get a green card?

12 A The last -- the last time I was in the Immigration
13 Court was February 2011 and I think it was that time.

14 Q Ms. Cho, I'm going to tell you that the last time you
15 were in Immigration Court was February 2012. Would that be
16 accurate?

17 A Yes, I think so.

18 Q The Exhibit 8 and Exhibit 9, the letters you wrote
19 were dated 2011; correct?

20 A (In English) Yeah.

21 THE INTERPRETER: A Yes.

22 MS. WALL: Q And you were detained at that
23 time; right?

24 A (In English) Yeah.

25 THE INTERPRETER: A Yes.

1 MS. WALL: Q So it had to have been 2012 when
2 you were released; right?

3 A Yes, I think so.

4 Q And so the last time that you took the medication
5 [REDACTED] was in or prior to February 2012; is that right?

6 A (In English) Yeah.

7 THE INTERPRETER: A Yes.

8 MS. WALL: Q Okay. When was your [REDACTED]
9 [REDACTED]

10 A (In English) 2008.

11 THE INTERPRETER: A 2008.

12 MS. WALL: Q When were you diagnosed with
13 [REDACTED]

14 A (In English) 2008, around April, May, something like
15 that.

16 THE INTERPRETER: A Around April or May of
17 2008.

18 MS. WALL: Q I'm going to show you what I've
19 marked as Defense Exhibit 3. Is that your claim form that you
20 filed with Frank Levi at Department of Homeland Security?

21 A (In English) Yeah. Yeah, yeah.

22 THE INTERPRETER: A Yes.

23 MS. WALL: Q Please turn -- look at the bottom
24 of the first page. Is that your signature?

25 A Yes.

1 Q And is that your phone number next to your signature?

2 A Yes.

3 Q And what is the date that you signed it?

4 A October 10th, 2012.

5 Q I'm going to show you what I'm marking as Defense

6 Exhibit 4. Is that your amended complaint in this case?

7 A Yes.

8 Q Please look on the very last page. Is that your
9 signature?

10 A Yes.

11 Q And on the page that's next to the last page, is that
12 your signature?

13 A Yes.

14 Q While you were in ICE custody, did you wear a watch?

15 A (In English) No.

16 THE INTERPRETER: A No.

17 MS. WALL: Q Did you carry your phone?

18 A (In English) No.

19 THE INTERPRETER: A No.

20 MS. WALL: Q Was there a clock in your cell?

21 A Yes, in the recreation room.

22 Q How many times a day did you go in the recreation
23 room?

24 A Yeah, it's the -- it's the -- the common space in
25 front of -- of everybody's cell room where you watch TV and eat

1 and all that stuff, so -- so you don't really go in and out of
2 it.

3 Q Okay. Do you currently have [REDACTED]?

4 A I'm not positive, but as far as the diagnosis
5 concerned, no.

6 Q When is the last time you were checked?

7 A When I was in Irwin County.

8 Q When is the last time that you went to a doctor for
9 anything?

10 A I haven't been able to go to any doctor since Irwin
11 County, but there was a time that I went to a local doctor for
12 a [REDACTED].

13 Q When was that?

14 A Last year.

15 Q And who is that doctor?

16 A I don't remember the name.

17 Q Where is it?

18 A (In English) On Riverside Drive, the urgent care,
19 medi-care, urgent medi-care.

20 THE INTERPRETER: A It's on Riverside Drive,
21 urgent medi-care.

22 MS. WALL: Q That was in 2012 or 2013?

23 A Last year.

24 Q 2012?

25 A Yes.

1 Q You have not been to a doctor of any kind in 2013; is
2 that correct?

3 A That's correct.

4 Q When you were diagnosed with [REDACTED] in 2008,
5 how soon after your diagnosis did you have [REDACTED]

6 A About a week -- about a week or maybe eight -- or
7 maybe eight days, so I got it done right away because it was
8 [REDACTED].

9 Q Who diagnosed you?

10 A [REDACTED].

11 THE INTERPRETER: A [REDACTED].

12 MS. WALL: Q What's the first name?

13 A (In English) [REDACTED].

14 THE INTERPRETER: A [REDACTED].

15 MS. WALL: Q And how do you spell [REDACTED]?

16 A (In English) [REDACTED] (sic), I suppose.

17 THE INTERPRETER: A [REDACTED]

18 THE WITNESS: A (In English) [REDACTED] [REDACTED].

19 MS. WALL: Q Is it [REDACTED] r [REDACTED]?

20 A (In English) [REDACTED]

21 Q With a [REDACTED]

22 A (In English) [REDACTED].

23 Q Is he in Macon?

24 A (In English) He's in Atlanta, Duluth, Gwinnett
25 County, Duluth and Suwanee, yes. Yes.

1 Q Where were you living when you were diagnosed?

2 A (In English) Suwanee, Georgia, Atlanta.

3 THE INTERPRETER: A In Suwanee, Georgia,
4 Atlanta.

5 MS. WALL: Q And what type of treatment -- did
6 you -- did -- strike that. Did you receive any treatment
7 between the day you were diagnosed and the day that you had
8 your [REDACTED]?

9 A Could you repeat the question?

10 Q Did you receive any treatment between the day you
11 were diagnosed and your [REDACTED]?

12 A After [REDACTED], I got [REDACTED] and [REDACTED]
13 therapy.

14 THE WITNESS: A (In English) For about 11
15 month.

16 THE INTERPRETER: A For about 11 months

17 MS. WALL: Q When you were diagnosed with
18 [REDACTED], your [REDACTED] was within seven to eight days
19 after; right?

20 A (In English) Yeah.

21 THE INTERPRETER: A Yes.

22 MS. WALL: Q During those seven or eight days,
23 did you receive any treatment or take any medication?

24 A No.

25 Q Did you have health insurance when you were diagnosed

1 with [REDACTED]?

2 A I did, but it wasn't accepted.

3 Q What was your health insurance company?

4 A (In English) I don't remember.

5 THE INTERPRETER: A I don't remember because
6 my husband took care of that.

7 MS. WALL: Q Do you have health insurance
8 currently?

9 A No.

10 Q When is the last time you had health insurance?

11 A I think it -- I think the last time was at that time
12 but it wasn't accepted so we had incurred a lot of debt.

13 Q Who was your doctor before you went to see Dr.
14 [REDACTED]?

15 A (In English) Dr. [REDACTED]. [REDACTED] [REDACTED]
16 Suwanee. He's in Suwanee, Dr. [REDACTED].

17 Q Do you know how to spell that?

18 A No.

19 THE WITNESS: A (In English) Just [REDACTED]
20 something [REDACTED].

21 MS. WALL: Q Are you saying [REDACTED]
22 [REDACTED]?

23 A (In English) Something like that. I'm sorry.

24 Q What kind of a doctor is Dr. [REDACTED]

25 A (In English) He's a family doctor, checking and

1 checkup. Checkup, that's all I know (inaudible) --

2 THE INTERPRETER: A That's all I know.

3 MS. WALL: Q Okay. So what I heard you say in
4 English is he's a family doctor, and then you said that's all
5 you know.

6 A (Witness nodding head)

7 Q Okay. Did you have a [REDACTED]?

8 A (In English) Dr. [REDACTED] his name is Dr.

9 [REDACTED] Dr. [REDACTED] - [REDACTED] he did for me,
10 and Dr. [REDACTED] is [REDACTED].

11 Q Can you spell that?

12 A (In English) [REDACTED] s [REDACTED] --
13 [REDACTED] (sic), [REDACTED], I suppose.

14 Q What's the first name?

15 A (In English) Oh, I don't remember first name, just
16 always just Dr. -- Mr. -- Dr. [REDACTED] is all, last name.

17 Q Male or female?

18 A (In English) Male.

19 Q And where is his office?

20 A (In English) Suwanee and Duluth and Lawrenceville.
21 Duluth and Suwanee, Lawrenceville.

22 Q Who originally diagnosed you with [REDACTED]

23 A Started with Dr. [REDACTED] and then ended at Dr.

24 [REDACTED]

25 Q And then were you doing your follow-up treatment with

1 Dr. [REDACTED]?

2 A Yes. That's right.

3 Q After your [REDACTED] other than your -- other
4 than the [REDACTED] and [REDACTED], were you taking any medications?

5 A After [REDACTED], [REDACTED], after -- yes, after,
6 [REDACTED].

7 Q What I'm asking is after [REDACTED], in addition to
8 [REDACTED] or [REDACTED], were you taking any pills?

9 A Yes.

10 Q Is that when you were taking [REDACTED]?

11 A No. I had to take some medication while I was
12 getting the [REDACTED] and [REDACTED] and [REDACTED] was
13 after all those therapies were finished, for two, three years.

14 MR. BLOODWORTH: Excuse me, Ms. Wall. I
15 don't mean to interrupt you.

16 MS. WALL: But you are interrupting me.

17 MR. BLOODWORTH: Okay. Well, I'm --

18 MS. WALL: Please don't interrupt me.

19 MR. BLOODWORTH: Okay. Well, I'm just --
20 I'm just trying --

21 MS. WALL: No. No, sir --

22 MR. BLOODWORTH: Okay. I'm just --

23 MS. WALL: -- please don't interrupt me.

24 MR. BLOODWORTH: Okay.

25 MS. WALL: We're in the middle of a

1 deposition.

2 MR. BLOODWORTH: All right. Okay. I'm
3 just wanting to make sure --

4 MS. WALL: No --

5 MR. BLOODWORTH: -- you get accurate
6 information.

7 MS. WALL: -- I don't need you to give
8 me accurate --

9 MR. BLOODWORTH: Okay. Okay.

10 MS. WALL: She's the deposing --

11 MR. BLOODWORTH: Okay.

12 MS. WALL: She's under oath.

13 MR. BLOODWORTH: Okay. I'm just trying
14 to help you clarify --

15 MS. WALL: Please stop.

16 MR. BLOODWORTH: Okay.

17 MS. WALL: Q During the lunch break, did you
18 and your husband talk about your testimony?

19 A (In English) No, I didn't try to. He tried, but I --
20 I did not. I told him to --

21 Q What did he try to say to you?

22 A (In English) I didn't let him speak to -- I didn't
23 let him -- I didn't want to talk to because I'm under oath and
24 she told -- Ms. Wall told me -- you told me to not to -- I
25 didn't discuss any at all because I didn't let him do it.

1 Q But he tried to talk to you about your testimony?

2 A (In English) He was -- he started just one, but I --
3 but I didn't let him at all.

4 Q So we're going to have to go through the interpreter.
5 The court reporter is not understanding. Let me back up. Did
6 you just say to me that your husband was trying to talk to you
7 about your testimony during lunch but you did not let him?

8 A (In English) Yeah.

9 THE INTERPRETER: A Yes.

10 MS. WALL: Q What did he say that made you
11 think he was about to talk to you about your testimony?

12 A So he was about to say something but I told him not
13 to say anything.

14 Q And then what did he say?

15 A (In English) He tried one more time but I -- I
16 (inaudible) -- she told me not to talk at all.

17 THE INTERPRETER: A So he tried to say
18 something again, but I stopped him again because she -- she
19 told me not to talk to you at all.

20 MS. WALL: Q Did your husband get upset?

21 A (In English) No. He just (inaudible) --

22 Q I didn't -- did you say something in English? I
23 didn't understand.

24 A (In English) No.

25 THE INTERPRETER: A No.

1 MS. WALL: Q He did not get upset?

2 A (In English) No. No, no, he is not upset because I
3 didn't talk at all.

4 Q You need to talk to your translator.

5 A No, he didn't get upset because I -- I just didn't
6 talk -- I didn't let him talk at all.

7 Q Would you be more comfortable if your husband was not
8 in the room while you're testifying right now?

9 A (In English) I don't mind either -- I don't mind.

10 THE INTERPRETER: A I don't mind either way.

11 MS. WALL: Q While you were taking the
12 [REDACTED], how often did you have to go to the doctor for
13 refills?

14 A You can just go to Wal-Mart and get it after it runs
15 out. A bottle runs out maybe once a month.

16 Q So you refilled your prescription once a month at
17 Wal-Mart; is that right?

18 A (In English) Yeah. Yeah.

19 THE INTERPRETER: A Yes.

20 (MR. BLOODWORTH TAPPING ON TABLE)

21 MS. WALL: Mr. Bloodworth, please stop
22 making noise, if you're trying to get your wife's
23 attention.

24 MR. BLOODWORTH: I'm not trying to get
25 her attention. I'm just -- I'm just sitting

1 here listening. I'm not -- I'm not -- there's
2 a gentleman between me and her. I'm not trying
3 to get her attention.

4 MS. WALL: I need you to stop banging
5 your pen and your glasses on the table. That --
6 please -- and one more time and I'm going to ask
7 the judge to just either come sit in here or let
8 you leave -- ask you to leave. Do you understand?

9 MR. BLOODWORTH: I don't think I've
10 interrupted you.

11 MS. WALL: Do you -- do you understand
12 what I just said?

13 MR. BLOODWORTH: I understand what you
14 said.

15 MS. WALL: Okay. I'm done talking about
16 it.

17 MR. BLOODWORTH: All right. I'm done, too.

18 MS. WALL: Thank you.

19 MS. WALL: Q Ms. Cho, you took your
20 medications and you refilled them at Wal-Mart once a month;
21 right?

22 A (In English) Yeah.

23 THE INTERPRETER: A Yes. Yes, I think once or
24 maybe one and a half -- every one and a half months.

25 MS. WALL: Q Did you have to go to the doctor

1 during the two to three years that you needed to take the
2 [REDACTED] for refills?

3 A Yes, I called and made an appointment and went there
4 a few times and told them how I was doing and get -- got
5 checked up.

6 Q Did you get a three-year prescription, or did you
7 have to keep renewing it every so often?

8 A I had to go and get -- get it renewed.

9 Q And did you make appointments for those renewals?

10 A Yes.

11 Q Did you keep those appointments?

12 A Yes.

13 Q Did you have to pay for the medications yourself?

14 A Yes.

15 Q How much were they?

16 A (In English) About \$13, something like that.

17 THE INTERPRETER: A About \$13 or something
18 like that.

19 THE WITNESS: A (In English) 13, yeah.

20 MS. WALL: Q Per month?

21 A (In English) Bottle.

22 THE INTERPRETER: A Per bottle.

23 MS. WALL: Q How long did one bottle last?

24 A A month to a month and a half.

25 Q And where did you get the money to pay for them?

1 A My husband paid for all them.

2 Q Was this during the time that your husband was
3 unemployed?

4 A He -- he didn't work almost -- he almost didn't work.
5 Most of the times, he didn't work, but he worked enough to
6 -- for us to eat and live.

7 Q Okay. Where did you keep your bottle of medications
8 when you were taking them?

9 A The place where you keep the medicines.

10 Q Was that in your home?

11 A (In English) Home, yeah.

12 THE INTERPRETER: A Yes.

13 MS. WALL: Q And how often did you take the
14 medicine in a day?

15 A One -- one pill a day.

16 Q Did you take it in the morning or at night?

17 A Morning.

18 Q When you were taken into ICE custody, were you at
19 home?

20 A No.

21 Q Where were you?

22 A (In English) Gwinnett County.

23 THE INTERPRETER: A In Gwinnett County.

24 MS. WALL: Q Were you --

25 A (In English) Detention -- the detention center.

1 THE INTERPRETER: A Detention center.

2 THE WITNESS: A (In English) Gwinnett County.

3 THE INTERPRETER: A The Gwinnett County

4 Detention Center.

5 MS. WALL: Q And did you have your medication
6 with you while you were at Gwinnett County?

7 A (In English) I didn't have.

8 THE INTERPRETER: A No.

9 MS. WALL: Q Was it at home?

10 A (In English) Yeah.

11 THE INTERPRETER: A Yes.

12 MS. WALL: Q And how long were you at Gwinnett
13 County Detention Center?

14 A (In English) Three -- three months.

15 THE INTERPRETER: A Three months.

16 MS. WALL: Q During those three months, did
17 you take [REDACTED]?

18 A (In English) No.

19 THE INTERPRETER: A No.

20 MS. WALL: Q Did you ask your husband to bring
21 your medication to you?

22 A (In English) Yeah.

23 THE INTERPRETER: A Yes.

24 MS. WALL: Q And did he?

25 A He couldn't because he was -- he had some situation

1 where he couldn't bring it.

2 Q What was the situation?

3 A I don't remember, but -- I don't remember it, but it
4 was a very urgent situation. Actually, I think he did bring me
5 -- I think actually he did bring it, but -- I think he actually
6 -- he brought it but wasn't able to hand it to me.

7 Q Did he -- do you know if he tried to give it to the
8 officials?

9 A I don't know.

10 Q Did you let anybody at Gwinnett County Detention
11 Center know that you needed to take a medication?

12 A Yes.

13 Q When did you let them know?

14 A (In English) After -- one month after.

15 THE INTERPRETER: A One month after.

16 MS. WALL: Q Did you see a doctor while you
17 were at Gwinnett Detention Center?

18 A Yes.

19 Q When did you see the doctor?

20 A About a month afterwards, I started seeing doctor.

21 Q And did you tell the doctor about your medications?

22 A (In English) Yeah. Yeah.

23 THE INTERPRETER: A Yes.

24 MS. WALL: Q And was that medication
25 prescribed by the jail doctor?

1 A No, I didn't get any.

2 THE WITNESS: A (In English) [REDACTED], I was
3 [REDACTED] and then I told --

4 THE INTERPRETER: A I was [REDACTED]. Even
5 though I was [REDACTED] --

6 THE WITNESS: A Even though I was [REDACTED] --
7 because Dr. [REDACTED] told me that I shouldn't [REDACTED] at all.

8 THE WITNESS: A (In English) No.

9 THE WITNESS: A I shouldn't -- I shouldn't do
10 the [REDACTED] at all, but I was [REDACTED], so I told the
11 doctor, but he wouldn't -- he wouldn't prescribe it to me.

12 MS. WALL: Q So did you ever file a complaint
13 with Gwinnett Detention Center?

14 A (In English) I don't remember.

15 THE INTERPRETER: A I don't remember.

16 THE WITNESS: A Yes, I did.

17 MS. WALL: Q Did you file a lawsuit?

18 A No.

19 Q Did you file a complaint while you were detained at
20 Gwinnett Detention Center?

21 A No.

22 Q When did you file a complaint with Gwinnett Detention
23 Center?

24 A While I was in Gwinnett County.

25 Q So did you file a complaint while you were at

1 Gwinnett County Detention Center?

2 A They just -- I just complained that the doctor didn't
3 -- doctor wasn't giving me medicine that I need, but it wasn't
4 anything -- any kind of lawsuit or anything.

5 Q Who did you complain to?

6 A County -- county jail, some supervisor or -- I don't
7 remember.

8 THE INTERPRETER: A County jail supervisor,
9 some -- I don't remember.

10 MS. WALL: Q And what was the result of your
11 not taking that medication for three months?

12 A Yeah, I had a lot of [REDACTED], [REDACTED]
13 and [REDACTED].

14 Q And did the [REDACTED] help those symptoms?

15 A That's correct because it kind of sedates you and
16 calms you down.

17 Q Have you been treated by a medical doctor for any
18 condition other than [REDACTED]?

19 A [REDACTED].

20 Q Have you ever been admitted to a hospital for
21 anything other than your [REDACTED]

22 A [REDACTED]

23 Q Have you ever been treated by a psychiatrist?

24 A [REDACTED]

25 Q Psychologist?

1 A [REDACTED]

2 Q Other than when you were at Gwinnett Detention
3 Center, have you ever had or been [REDACTED]

4 A In the -- when I was in Irwin County, I did twice,
5 and there are records for it.

6 Q Records for what?

7 A I had talked with the [REDACTED] there and we
8 talked about [REDACTED]

9 [REDACTED]

10 Q What did you get prescribed?

11 A They -- it should be -- after that, they gave me
12 [REDACTED].

13 Q After the first or the second time?

14 A After the second visit. After the second visit, I
15 had -- also had a visit with a major doctor or the specialist,
16 specialist doctor, and I started getting the [REDACTED]

17 Q Is it your belief that you were given [REDACTED]
18 because you were [REDACTED]

19 A I don't know about that, but when I take [REDACTED], I
20 don't get [REDACTED] and I don't get [REDACTED]. But now --
21 but now I don't need to take them.

22 Q Who was the specialist that you saw?

23 A I don't remember his name.

24 Q Were you taken from Irwin County Detention Center to
25 the doctor?

1 A No. He's a -- he's a doctor that stays there.

2 Q So you were seen by a [REDACTED] at Irwin; correct?

3 A (In English) Yeah.

4 THE INTERPRETER: A Yes.

5 MS. WALL: Q And you were seen by a major

6 doctor at Irwin; correct?

7 A (In English) Yeah. Yeah.

8 THE INTERPRETER: A Yes.

9 MS. WALL: Q Was there a third type of doctor
10 that you saw while you were at Irwin?

11 A No. But I did got out of the facility to get a [REDACTED]

12 [REDACTED]

13 Q And did someone from the detention facility transport
14 you?

15 A Yes.

16 Q Have you ever been denied access to your Immigration
17 hearings?

18 A Could you repeat that?

19 Q Have you ever been denied access to your Immigration
20 hearings?

21 A No.

22 Q I'm going to ask you some questions about your
23 Immigration lawyers; okay? I don't want you to tell me
24 anything that you and your lawyer discussed; okay?

25 A (In English) Yeah.

1 THE INTERPRETER: A Yes.

2 MS. WALL: Q Were you ever represented by
3 Chris Palazzalo, P-a-l-a-z-z-a-l-o?

4 A Yes.

5 Q When did you hire him?

6 A He was the attorney that represented me on the eighth
7 time that I had to go to the Immigration Court in Atlanta.

8 Q Do you know what month and date and year that was?

9 A (In English) I don't remember exactly but it was
10 (inaudible) -- 2011, November, something like that.

11 THE INTERPRETER: A I don't remember exactly
12 but maybe around November of 2011 --

13 THE WITNESS: A (In English) October, yeah,
14 something like that.

15 THE INTERPRETER: A -- November, October of
16 2011.

17 MS. WALL: Q And why did you hire him?

18 A I had three attorneys previous to him, but they could
19 -- they couldn't do anything when the judge didn't allow my
20 husband to come into the court, so they were kind of incapable,
21 so this was my fourth attorney, and -- and --

22 Q Please let your interpreter finish before --

23 A (In English) I'm sorry.

24 Q -- you interrupt him.

25 A (In English) Yeah.

1 THE INTERPRETER: A And the way that I hired
2 him was, right that day in court, he was rushing into the court
3 and he found out that my husband was not being allowed into the
4 court, so he complained to the judge.

5 MS. WALL: Q Did you hire him after he walked
6 into the court or did you hire him to come to court with you?

7 A No. We had already hired him, and he was supposed to
8 attend the -- attend the court hearing for us, but -- but ICE
9 -- ICE was not letting my husband come in and threatening him.

10 Q Why did you hire Mr. Palazzalo? What did you hire
11 him to do?

12 A I hired him because Judge Cassidy had scared away all
13 my three previous attorneys because there was a time when we
14 paid \$600 to attend the hearing, but still, he wasn't allowed
15 to come into the hearing, and these attorneys, they were all
16 unable to allow my husband to come into the court.

17 Q So did you --

18 MS. WALL: Please. Please, let's -- why
19 don't you tell her to give you an answer in short
20 bursts so that you can complete the translation and
21 allowing you to not have to listen to paragraph
22 narrations?

23 THE WITNESS: A Okay. Can I add one thing?

24 MS. WALL: Q Sure.

25 A (In English) Thank you.

1 THE INTERPRETER: A So judge would scare away
2 all my attorneys, so I don't have anybody, so I go there on my
3 own, and judge would then ask you why are you here by yourself.

4 MS. WALL: Q So were you hiring these
5 attorneys to help get your husband into the courtroom, or were
6 you hiring them for something else with your Immigration case
7 or both?

8 A Both, my husband should have been allowed to come
9 into the courtroom, but they blocked him, and so that was a
10 illegal act and they called him -- they accused him of being a
11 terrorist.

12 Q How did --

13 THE WITNESS: (In English) I'm sorry.
14 You just work. I'm sorry.

15 MS. WALL: Q I'm sorry. I didn't understand.

16 THE WITNESS: (In English) I'm sorry.
17 This is your job.

18 MS. WALL: Q Okay. How did Mr. Palazzalo stop
19 being your attorney?

20 A The Palazzalo came into hearing and then told the
21 judge why are you not allowing Mr. Bloodworth to come into the
22 hearing, and the judge told him that Mr. Bloodworth is not
23 allowed to come into the hearing, and then the judge motioned
24 Mr. Palazzalo to come to him, and they -- they went into --
25 into the back into his chamber for 30 minutes, and when Mr.

1 Palazzalo came out, I don't know what the judge said to him and
2 what kind of bad things about us he said to him, but he told me
3 that he is very disappointed in me. And that was the end.

4 Q So do you know if your husband fired him?

5 A So when my husband called in the next day to find out
6 what happened, he would just talk nonsense to him, and so my
7 husband really got mad, and, you know, this is the eighth time
8 that we tried to --

9 THE WITNESS: Can I have some of those
10 napkins, please? Can I have one?

11 MS. WALL: Oh sorry. Yes.

12 THE WITNESS: A -- this was the eighth time
13 that we had tried to have my husband come into the court, and
14 we had paid this lawyer to help us, but he wouldn't do what he
15 was paid to do, but he was talking about some nonsense.

16 MS. WALL: Q Did your husband tell Mr.
17 Palazzalo ahead of time that he was having trouble getting into
18 the courthouse or courtroom?

19 A No. No, he didn't. We just assumed, since we had
20 been -- he had been denied access like six, seven -- six times
21 prior, we just trusted the lawyer that he would be able to get
22 him in.

23 Q So do you think that the lawyer knew he should have
24 been trying to get Mr. Bloodworth in beforehand?

25 A I don't know. I don't remember.

1 Q Do you want to take a break and go into the ladies'
2 room, Ms. Cho?

3 A (In English) Yeah. Thank you.

4 (SHORT BREAK)

5 MS. WALL: Q Ms. Cho, are you ready?

6 A (In English) Yeah.

7 Q Okay. You realize you are still under oath. Okay.
8 We were talking about attorney Chris Palazzalo, and you were
9 telling me that you don't know if Mr. Palazzalo knew that he
10 needed to do something for your husband to come in.

11 A (In English) Yeah.

12 THE INTERPRETER: A Yes.

13 THE WITNESS: A (In English) Yes.

14 MS. WALL: Q When is the last time that you
15 spoke to Mr. Palazzalo?

16 A That was the -- that was the last time, at the court.

17 Q When is the last time your husband spoke to him, if
18 you know?

19 A From what I know, the day after is when they had the
20 conversation, according to my husband.

21 Q Do you know if he talked to him in person or was it
22 by phone?

23 A By phone.

24 Q And how much did you pay him?

25 A (In English) 2,500.

1 THE INTERPRETER: A 2,500.

2 MS. WALL: Q Was any of that money refunded to
3 you?

4 A No, not at all.

5 Q Do you know whether Mr. Palazzalo filed any documents
6 for you?

7 A I don't think he filed any paperwork, as far as I
8 know.

9 Q And do you know if Mr. Palazzalo is who paid the 601
10 application fee?

11 A I don't know. I think my husband paid the \$600 for
12 that fee and that Mr. Palazzalo had the paperwork for the 601
13 and was going to use it during the hearing.

14 Q Do you know or -- strike that. How did you find Mr.
15 Palazzalo to represent you?

16 A My husband hired him.

17 Q How did he find him?

18 A I don't know the details.

19 Q Have you ever been represented by Joe Azar, A-z-a-r?

20 A He was the first attorney.

21 Q When did you hire him?

22 A I think around May 10th because that was our first
23 hearing.

24 Q Was that 2011?

25 A I think so.

1 Q And what did you hire him to do?

2 A We asked him to -- to start with the waiver and then
3 end with the 601 hearing.

4 Q And did he do that for you?

5 A We paid him to do all that, but when the actual time
6 of the hearing came, he forgot to bring the paperwork,
7 necessary paperwork.

8 Q How much did you pay him?

9 A \$1,000.

10 Q So is that the last time that he represented you?

11 THE INTERPRETER: The interpreter is going
12 to clarify to the deponent because I don't think
13 she understood my question -- your question.

14 MS. WALL: Okay. So let me clarify the
15 question then.

16 THE INTERPRETER: Okay.

17 THE WITNESS: (In English) I --

18 MS. WALL: Q Mr. -- okay. Sorry. Don't
19 interrupt me so I'll finish and then you can answer, okay, Ms.
20 Cho? Do you understand that?

21 A (In English) Yeah.

22 Q You hired him to represent you in court on May 10th,
23 2011; right?

24 A (In English) Yeah.

25 THE INTERPRETER: A Yes.

1 MS. WALL: Q You hired him before that date so
2 he could have your paperwork in court; right?

3 A (In English) Yeah.

4 THE INTERPRETER: A Yes.

5 MS. WALL: Q And when he didn't bring the
6 paperwork, what was your next step with him?

7 A Okay. So -- so at -- at that hearing, he forgot to
8 bring the paperwork, and the judge was kind of speechless at
9 the attorney for not bringing the paperwork for the hearing,
10 and it seemed like judge didn't like attorney; judge didn't
11 like me; judge didn't like my husband. My husband was outside
12 unable to come in because he was not allowed to come in.

13 MS. WALL: Is that the end of the answer?

14 THE INTERPRETER: (Interpreter nodding head)

15 MS. WALL: Okay.

16 MS. WALL: Q So on May 10th, 2011, your
17 husband was not allowed to come in when Mr. Azar was
18 representing you; right?

19 A Yes.

20 Q Was that the last time that Mr. Azar represented you?

21 A No. He came to court two, three times afterwards at
22 -- to see -- to try and remedy the situation, but he couldn't
23 do anything, and he returned our money back to us.

24 Q Did he decide to not represent you anymore, or did
25 you decide to fire him?

1 A Because it looked like he was unable to do anything
2 for us, we thought maybe he is not capable, so we hired the
3 next attorney, Schwartz.

4 Q So did you fire Mr. Azar?

5 A We didn't fire him. He just returned the money
6 saying that he was sorry.

7 Q And then the next attorney you hired was Dale
8 Schwartz?

9 A (In English) Dale Schwartz.

10 THE INTERPRETER: A Yes.

11 MS. WALL: Q And did he come to court for you?

12 A No, he didn't come to the court, but he tried to talk
13 to ICE over the phone to try to figure out what's going on.

14 Q And how much did you pay Mr. Schwartz?

15 A \$1,000 to start.

16 Q And how much did you end up paying him?

17 A He requested additional \$4,000, but we didn't feel
18 like he was able to accomplish much, so we didn't give it to
19 him.

20 Q And what did he find out by calling ICE?

21 A I think he requested the release, some kind of
22 humanitarian something release and also requested to give
23 medication, cancer medication, and also to allow my husband
24 into the court, but he wasn't able to do any of those.

25 Q Did he tell you what he was told about those things?

1 A I don't remember.

2 Q So did you --

3 A (In English) I'm sorry.

4 THE INTERPRETER: A He said that he tried to
5 call the people at the ICE, like supervisors and all the
6 people, but that he didn't get any calls back -- calls returned
7 to him.

8 MS. WALL: Q And did you fire Mr. Schwartz, or
9 did he quit?

10 A Was neither because we had already knew him before we
11 hired him. But we didn't fire him or he quit. We just didn't
12 give him the additional \$4,000 that he requested, so it just
13 kind of ended there.

14 Q When did you hire Mr. Schwartz?

15 A I just know him that he was our second attorney. I
16 don't know the date.

17 Q So your first attorney was Joe Azar from May 10th,
18 2011 until when?

19 A He came to the court three, four times for us.

20 Q And the second lawyer was Mr. Schwartz; correct?

21 A Yes.

22 Q And who was the third lawyer?

23 A (In English) Palazzalo.

24 THE INTERPRETER: Huh?

25 THE WITNESS: (In English) Palazzalo.

1 THE INTERPRETER: A Pallazolla.

2 MS. WALL: Q And who was --

3 A (In English) I have four lawyers.

4 Q Who was the fourth lawyer?

5 A (In English) Bonnie Youn, Korean. Bonnie Youn.

6 THE INTERPRETER: A Bonnie Youn, a Korean
7 attorney.

8 THE WITNESS: A (In English) Bonnie Youn.

9 MS. WALL: Q Y-o-o-n (sic)?

10 A (In English) I think so. Bonnie Youn, B-u-n-n-y
11 (sic).

12 Q Why did you hire her? So my question was when did
13 you hire her?

14 THE INTERPRETER: Let's see.

15 MS. WALL: Q Let's start over.

16 A (In English) I'm sorry. Yeah.

17 Q Okay. So Ms. Cho, I'm going to ask a question about
18 a date or a time frame. Please answer that first. When did
19 you hire Ms. Youn?

20 A She's the last attorney, but I don't -- I don't
21 remember exactly when.

22 Q How many times did she come to court?

23 A I think like twice.

24 Q And did you hire her to -- well, strike that. What
25 did you hire her to do?

1 A To start with the 601 paperwork and my release. And
2 I'm a -- I'm a legal resident here because I was -- I had
3 finished the interview with Immigration, and they -- they told
4 me that they will send me the green card over the mail, and
5 that was in 2004 but that they had detained me illegally for
6 ten months saying that I was a illegal resident.

7 Q I asked a -- I asked a different question, but let me
8 understand what you just said.

9 MS. WALL: Do you want to translate that?

10 THE INTERPRETER: (Interpreter complies)

11 MS. WALL: Q Is it your -- is it your
12 testimony that when you were detained by ICE in 2011 you were a
13 legal resident?

14 A Yes. Yes, I was a legal resident because I had
15 finished the interview, and they told me that they will send
16 the green card in two weeks, but they didn't send it.

17 Q And when was that?

18 A In 2004.

19 Q Do you recall not showing up for your hearings in
20 Hawaii?

21 A We went to Hawaii just to apply for the green card --
22 green card again, but we gave it up and came back to New York.

23 Q Who is "we?"

24 A My husband.

25 Q When was that?

1 A I was there by myself, actually, to apply. My
2 husband was in New York.

3 Q When was that?

4 A (In English) 2004 -- 2005, November, something like
5 that, around -- after -- after they didn't send the green card
6 in two weeks, we wait another year and then after (inaudible)
7 -- they didn't send anything after a year, so I (inaudible) --

8 THE INTERPRETER: A So I think it was 2005,
9 because when I was promised a green card in 2004, I didn't get
10 anything. So we waited for about a year and then went to -- I
11 went to Hawaii to -- to -- to apply for it again.

12 MS. WALL: Q Would you look at Exhibit 8
13 again, please? And I've turned it to Page 2 for you. Would
14 you please read the fourth paragraph? Would you read it out
15 loud.

16 A (In English) Okay. At the time, my youngest brother
17 and sister-in-law husband was help me out -- help me out. The
18 time I think that -- I think that when the Immigration
19 department -- department in Hawaii was calling me for
20 interview. By -- by this time, I was going through and so much
21 and -- and might have missed their communication.

22 Q Is that what you're talking about that you already
23 had gone through your interview but had not received your green
24 card? Was that in two thousand --

25 A (In English) Not this one.

1 Q Okay. So explain again to me when did you become a
2 legal resident waiting for your green card?

3 A So what I'm saying, when I say I'm a legal resident,
4 is when I went to that interview, Immigration -- final
5 Immigration interview in 2004 and they said they will send a
6 green card in two weeks and -- but I didn't receive it. The --
7 the fact that I didn't receive it is not my fault but the
8 government's fault and that caused me [REDACTED], because
9 since then, I haven't been able to breathe freely.

10 Q Would you look at Exhibit 8 again for me, and on Page
11 1, can you read Paragraph 2?

12 A (In English) I did -- I told -- I did wrong --

13 Q Wait. Slow down, please. So the court reporter is
14 going to write down what you're saying, so if you would, just
15 read it slowly.

16 A (In English) I did admit I did wrong when I went
17 shoplifting, and I am very sorry. I also admit I failed to --
18 failed to pursue my green card in Hawaii for -- for that. I
19 since -- since apologize. I --

20 Q It looks -- the word looks like sincerely to me. Is
21 that the word --

22 A (In English) Sincerely --

23 Q -- you wrote?

24 A (In English) -- kind of -- it's not correct.

25 Sincerely apologize. I was careless as I did no understand the

1 severity of my action and failed to keep things under my
2 control.

3 Q And you wrote that letter in 2011 to Judge Cassidy;
4 correct?

5 A (In English) I did. Yes, I did.

6 THE INTERPRETER: A Yes.

7 THE WITNESS: A (In English) Yeah.

8 MS. WALL: Q So going back to my question
9 about Ms. Bonnie Youn, you hired her to finish the 601 process;
10 correct?

11 A Yes, 601 and also to -- to reveal those interviews
12 into the final interview that had happened in 2004 because she
13 had researched all that stuff beforehand.

14 Q Was your husband in court with Ms. Bonnie Youn?

15 A Yes.

16 Q And did Ms. Bonnie Youn complete your case for you?

17 A She tried her best, but Judge had made some requests
18 from her that she couldn't fulfill, so she had a lot of hard
19 time. And she told me that I would have to be detained for at
20 least another three months. That's why my husband started the
21 -- filed the lawsuit. Then after that, they immediately
22 allowed my husband to attend the court hearings. And then they
23 said where's your husband. We need to see him now and then
24 gave us the green card right away, too.

25 Q So your husband came to court with Ms. Youn; correct?

1 A (In English) Yeah.

2 THE INTERPRETER: A Yes.

3 MS. WALL: Q And that was before he filed the
4 lawsuit; right?

5 A (In English) Yeah.

6 MS. WALL: Please stop, Mr. Bloodworth.

7 THE WITNESS: (In English) Lamar, please.

8 MS. WALL: Q I'm sorry. What was that?

9 A (In English) I'm calling him Lamar.

10 Q Oh, did you just -- what did you just say to
11 him?

12 A (In English) Lamar. Lamar, middle name is
13 Lamar.

14 Q Oh, you called him Lamar. But what did you say --

15 A (In English) Yeah.

16 Q -- to him?

17 A (In English) I said please, please stop
18 (inaudible) -- try to --

19 Q You're asking him to stop, as well?

20 A (In English) Yeah.

21 MS. WALL: Why don't we take a five-minute
22 break?

23 THE WITNESS: (In English) That will be good.

24 MS. WALL: I'm going to ask you to just wait
25 outside for her, and you can talk with the security

1 guards, if you need, and I can talk to them for you,
2 if you want.

3 MR. BLOODWORTH: And do what now?

4 MS. WALL: You're interrupting, and it's
5 causing your wife to look at you to tell you to
6 stop doing something.

7 MR. BLOODWORTH: Okay. This is what I'll
8 do then. Stephanie, I'm going to leave.

9 THE WITNESS: (In English) It's okay.

10 MR. BLOODWORTH: No. I'm going to leave.

11 THE WITNESS: (In English) He's okay. I
12 want him to --

13 MR. BLOODWORTH: Hold on.

14 THE WITNESS: (In English) -- stay here.

15 MR. BLOODWORTH: Hold on. I don't want to
16 stay.

17 THE WITNESS: (In English) Oh okay.

18 MR. BLOODWORTH: I'm going to leave --

19 THE WITNESS: (In English) Okay.

20 MR. BLOODWORTH: -- and I'll let you finish
21 this; okay? And I -- and I hope that you can conduct
22 your business in the way that you want to; okay? I
23 -- I -- I haven't interrupted you, but I -- but I
24 understand why you're doing that. I understand.

25 THE WITNESS: (In English) I hope you

1 understand he -- Ms. Wall and Mr. Bloodworth, your
2 relationship --

3 MR. BLOODWORTH: So I haven't --

4 MS. WALL: You're talking at the same time.

5 MR. BLOODWORTH: I haven't --

6 MS. WALL: She's trying to take it down.

7 MR. BLOODWORTH: I haven't -- I haven't
8 interrupted you, but I'll be -- believe me, I'll be
9 happy to leave this place.

10 THE WITNESS: (In English) No. He's been
11 very (inaudible) -- Ms. Wall. He's been very,
12 very angry and upset with you. He's been -- he
13 has been. That's true.

14 MR. BLOODWORTH: Excuse me. I'll come pick
15 you up at 5 o'clock; okay?

16 THE WITNESS: (In English) Okay.
17 He's been very uncomfortable. That's why
18 it's just a little bit -- but I hope you -- he
19 was -- he was very -- I've never seen him (inaudible)
20 -- before act (inaudible) -- before.

21 THE COURT REPORTER: Act --

22 MS. WALL: Q Act what?

23 A (In English) He -- he's act was very strange last
24 month, one month.

25 Q And you say it's because he's been angry with me?

1 A (In English) Kind of. Ms. Wall -- and you and my
2 husband relationship wasn't smooth. I don't know whose fault
3 it is. It's really my husband. I thought my husband very
4 (inaudible) -- everything you need.

5 THE COURT REPORTER: She's going to need to
6 speak through him because --

7 MS. WALL: Q Can you speak through him because
8 she can't understand.

9 A (In English) Yeah.

10 Q Go ahead.

11 A So my husband was very upset because he provided Ms.
12 Wall with everything that she had asked for, and Judge told
13 both Ms. Wall and my husband that they would need to exchange
14 information and documents, and my husband did his part and
15 provided everything that was requested to his best, but Ms.
16 Wall still treated him like, you know, really badly, and my
17 husband is really upset, and I've never seen him so upset.

18 THE WITNESS: A (In English) I'm sorry.

19 THE INTERPRETER: A That's -- that's what I
20 felt.

21 MS. WALL: Q Okay. That's fine. What I'm
22 trying to understand is should I be afraid that your husband is
23 going to try to hurt me?

24 A No, you don't have to worry about that.

25 Q Well, you said that you've never seen him so angry as

1 he was with me; correct?

2 A That's true, and he was -- he's so disappointed with
3 you like I've never seen him be disappointed before, but I
4 don't think he'll -- he'll harm you or anything.

5 Q Well, what did he say that -- about me?

6 A (In English) Well, I can't -- I can't tell that
7 because this is -- this is his privacy, his privacy. He
8 doesn't want me to tell, but he wasn't --

9 THE INTERPRETER: A He's not a person to -- to
10 do you any harm, not at all, but he was taking it out on me in
11 the beginning.

12 MS. WALL: Q What was he saying to you or
13 doing to you?

14 A For the past month, he was so upset with you he -- he
15 got really mad, and I guess all that -- that pointed at me.
16 I've never seen him like that.

17 Q What did he do?

18 A I mean things that he can just say -- things that he
19 can just say normally he would, you know, shout it and yell at
20 me.

21 Q And did he tell you it was because he was mad at me?

22 A Yes. Yes, that's -- yes, that's what -- that's what
23 I mean.

24 Q Has he ever hit you?

25 A No, not -- not even once for the past 12 years that

1 I've -- that we've been married.

2 MS. WALL: Okay. Let's take a five-minute
3 break.

4 THE WITNESS: (In English) Thank you. Thank
5 you.

6 (SHORT BREAK)

7 MS. WALL: Q We're going to go back on the
8 record. Ms. Cho, you are still under oath. Before we took a
9 break, you and I were talking about your husband. What I
10 wanted to ask you is do you -- have you seen him lose his
11 temper with other people?

12 A Yes, a lot of times.

13 Q And would you say that he's aggressive?

14 A He is very aggressive in -- in -- verbally, but his
15 -- his heart is not aggressive.

16 Q Ms. Cho, I can tell you that we are not going to
17 finish your deposition today.

18 A (In English) It's okay.

19 Q We will have to come back --

20 A (In English) Okay.

21 Q -- and reschedule it.

22 A (In English) Okay.

23 Q We were talking about Attorney Bonnie Youn. How much
24 did you pay her?

25 A (In English) \$1,000

1 THE INTERPRETER: A \$1,000 to start.

2 MS. WALL: Q And then did you pay her any
3 more?

4 A She also requested additional \$3,000, and she told me
5 that I would have to be detained for additional -- at least
6 another three months. So we got so upset we said forget it,
7 and we just filed lawsuit on our own, and I got released.

8 Q Did Mr. Schwartz return the \$1,000 to you?

9 A No. I wish -- I wish we got them back.

10 Q Do you know an attorney by the name of Keegan
11 Federal?

12 A No.

13 Q Do you know an attorney by the name of Ray Lerer,
14 L-e-r-e-r?

15 A (In English) Lerer, yeah. Yes. Yeah, yeah.

16 THE INTERPRETER: A Yes.

17 MS. WALL: Q And is he your lawyer?

18 A We're thinking about hiring him, but we're thinking
19 about other people, as well, so we're -- we're thinking about
20 him now.

21 Q And have you ever talked with him?

22 A Yes, about twice.

23 Q And are you thinking about hiring him to represent
24 you in this case?

25 A Yes, we're just thinking about it, but it's not

1 definite.

2 Q Has he ever been your lawyer before?

3 A No, not at all.

4 Q Go to Exhibit 3. That's going to be this document
5 (indicating). You told me earlier that that is your claim that
6 you filed.

7 A Yes.

8 Q Go to Page 3. Do you recognize that as a letter
9 addressed to -- or a letter that says administrative claim on
10 the top; do you see that?

11 A (In English) Yes.

12 THE INTERPRETER: A Yes.

13 MS. WALL: Q And was this attached to your
14 claim form?

15 A Yes, I think so.

16 Q Your claim form was dated October 10th, 2012;
17 correct?

18 A (In English) Yeah.

19 THE INTERPRETER: A Yes.

20 MS. WALL: Q Okay. Go to the next to the last
21 page. Do you see that that letter is dated October 10th, 2012,
22 as well?

23 A (In English) Yeah.

24 THE INTERPRETER: A Yes.

25 MS. WALL: Q Okay. And that letter is

1 addressed to Mr. Levi, L-e-v-i; correct?

2 A Yes.

3 Q And flip over to one page before that. Do you see
4 that, a letter dated April 2nd, 2013 addressed to you?

5 A Where is the date?

6 Q At the top.

7 A This one?

8 Q Yes. Do you see the date, April 2nd, 2013?

9 A (In English) Yeah.

10 THE INTERPRETER: A Yes.

11 MS. WALL: Q And do you see that it's
12 addressed to you at your P.O. box?

13 A (In English) Yeah, yeah. Yes. Yeah. Yeah. Yes.

14 THE INTERPRETER: A Yes.

15 MS. WALL: Q Okay. In that letter, do you see
16 that the person signing the letter is stating that your claim
17 has been received by ICE on October 22nd, 2012?

18 A (In English) Yeah.

19 THE INTERPRETER: A Yes.

20 MS. WALL: Q Would it be fair to say that you
21 filed your claim with Frank Levi, who then transferred it to
22 ICE for you?

23 A (In English) Yeah.

24 THE INTERPRETER: A Yes.

25 MS. WALL: Q Now, flip to the third page from

1 the front. We're looking at a letter dated October 28th, 2012;
2 right?

3 A (In English) Yes. Yes. Yeah.

4 Q Okay. Please flip to the next page. Is that your
5 signature?

6 A (In English) Yes.

7 THE INTERPRETER: A Yes.

8 MS. WALL: Q Did you write this letter?

9 A With my husband.

10 Q Okay. All right. Please look at Paragraph 1, the
11 numbered Paragraph 1. Do you see that?

12 A (In English) Yeah.

13 THE INTERPRETER: A Yes.

14 MS. WALL: Q So this letter has a full
15 paragraph, and then it has ten numbered items; correct?

16 A (In English) Yes.

17 THE INTERPRETER: A Yes.

18 MS. WALL: Q I'm going to ask you about the
19 information in those numbered paragraphs; okay?

20 A (In English) Yeah.

21 Q All right. Number two, please look at number two.

22 MS. WALL: That's the office calling.

23 Let's -- let's stop for a minute.

24 THE WITNESS: (In English) Okay.

25 (OFF THE RECORD)

1 MS. WALL: Q Ms. Cho, are you ready?

2 A (In English) Yes.

3 Q Have you looked at Exhibit -- well, we were looking
4 at Exhibit 3. Flip to the third page, please. Okay. Look at
5 number two. Do you see where you say the words so what in
6 quotation?

7 A (In English) Yeah. Yeah.

8 THE INTERPRETER: A Yes.

9 MS. WALL: Q Who said that?

10 A This is what the ICE agent had told -- responded to
11 my husband when he said that I needed medication since I was a
12 [REDACTED].

13 Q So this is not something somebody said to you?

14 A That's right.

15 Q And do you know who it was that said that to your
16 husband?

17 A (In English) I don't know -- I don't know about who
18 it is. I don't -- I don't know.

19 THE INTERPRETER: A I don't know.

20 THE WITNESS: A (In English) But it is -- this
21 was ICE told my husband.

22 MS. WALL: Q That's what ICE told my husband;
23 is that what you just said? If you talk in English, Ms. Cho,
24 you have to talk over here so she can write it down. I would
25 prefer you talk to your translator; okay? Look at number

1 three. Who is the private physician that you're talking about
2 in that first sentence?

3 A (In English) I guess this is Dr. [REDACTED]

4 THE INTERPRETER: Huh?

5 THE WITNESS: (In English) Dr. [REDACTED].

6 THE INTERPRETER: Dr. [REDACTED]?

7 THE WITNESS: (In English) [REDACTED], Dr. [REDACTED]

8 MS. WALL: Q Are you saying [REDACTED], [REDACTED]

9 A (In English) Dr. [REDACTED] the (inaudible) --

10 Q Physician.

11 A (In English) Physician. Physician. I'm sorry.

12 Q Please read -- let's make it easy. Ms. Cho, please
13 read number three out loud.

14 A (In English) I am currently under the supervision of
15 my own private physician for follow-up as a result of the six
16 months isolation ICE -- by ICE.

17 Q So who is the private physician whose supervision you
18 were under on October 28th, 2012?

19 A I'm not sure what this means. Can you repeat what
20 this -- what this means?

21 Q Can you explain your number three to me in your
22 letter?

23 A I need to think about it one second. I don't really
24 know what this means so I can't really -- I can't really
25 formulate a response. I don't know right now.

1 Q Did you write this letter?

2 A Together with my husband.

3 Q Did you tell him what to write?

4 A No, I did not tell him what to write. Do you want me
5 to tell you the background, all the background?

6 Q No. I just -- I want you to just answer the
7 questions. Who was your doctor on October 28th, 2012? Who was
8 your doctor?

9 A Is this when I was in the detention center?

10 Q Were you in the detention center in October of 2012?

11 A No.

12 Q My understanding is you were released in February of
13 2012?

14 A (In English) Right. That's right. I'm sorry for
15 confuse.

16 Q So were you seeing a doctor after you were released
17 from detention?

18 A (In English) No.

19 THE INTERPRETER: A No, I didn't. I wasn't.

20 MS. WALL: Q So would you say that number
21 three is --

22 A One second. When you say treating with the doctor,
23 what does that mean?

24 Q Your number three says I am under the supervision of
25 my own private physician. What I see that to mean is that you

1 are being treated medically by a doctor.

2 A Now I remember. I think they're talking about --
3 this is talking about when I was staying at the detention
4 center. I had met twice with a counselor or a person that I
5 talked with about my [REDACTED] and next to the
6 doctor's building there was kind of another facility where I
7 stayed two days for examination. I think that's what this is
8 talking about.

9 Q And that was while you were still in detention?

10 A Yes.

11 Q So why does it say your private doctor instead of the
12 government doctor?

13 A I don't know why it said that. If that's an error,
14 then we need to fix it.

15 Q So then is it fair to say that you did not see any
16 doctors for any condition after you were released from
17 detention, except for a [REDACTED]

18 A Yes, it was a -- it was [REDACTED], [REDACTED]
19 [REDACTED].

20 Q Other than that, you have not been to a doctor for
21 anything since you were released in February 2012; correct?

22 A No, not to my recollection.

23 Q Have you seen Dr. [REDACTED], [REDACTED], since your release?

24 A (In English) Yeah.

25 THE INTERPRETER: A Yes.

1 MS. WALL: Q When?

2 A We had come to -- I had come to see him right after
3 being released and coming back from Irwin County, and then I
4 saw him three weeks ago.

5 Q And are you seeing him for anything related to your
6 detention?

7 A Could you repeat that so I can answer yes or no?

8 Q Did you see Dr. [REDACTED] for any treatment related to
9 your detention at Irwin County?

10 A Somewhat, yes. I guess, yes.

11 Q What were you seeing Dr. [REDACTED] for?

12 A She said -- she said that the reason I committed
13 shoplifting because my brain had been altered from the
14 experience of getting my [REDACTED] so when he said
15 that, since then, I went to see him.

16 Q All of your shoplifting convictions were prior to
17 your Irwin County Detention; correct?

18 A (In English) Yeah.

19 THE INTERPRETER: A That's right. Yes.

20 MS. WALL: Q So why were you seeing Dr. [REDACTED]
21 in October of 2012. Strike that. Let me -- let me ask you:
22 You went to see Dr. [REDACTED] you said, three weeks ago; right?

23 A (In English) Almost, yeah, not (inaudible) -- but
24 almost.

25 Q Three weeks ago. And when did you see him before

1 that?

2 A As soon as I came back from Irwin County.

3 Q That would have been sometime after February 2012;
4 right?

5 A Yes, early March or April.

6 Q So why were you seeing or why did you go to see Dr.
7 [REDACTED] in early March or April of 2012?

8 A My husband was seeing Dr. [REDACTED] for his mental
9 aggravation due to all these troubles that he was having with
10 Immigration for my case, and he had been seeing Dr. [REDACTED] for a
11 long time, even a long time before because his -- because his
12 history with his divorce and other traumas.

13 Q So why did you go to see Dr. [REDACTED]?

14 A So he needed to get the treatment from Dr. [REDACTED]
15 because it is over the trouble that he was experiencing through
16 this case, Immigration case.

17 Q Why were you seeing Dr. [REDACTED] in early March or April
18 of 2012?

19 A I had first seen him -- seen Dr. [REDACTED] when I was in
20 Irwin County, and that's why I went to see him after -- as soon
21 as I was released.

22 Q Did Dr. [REDACTED] come to visit you at Irwin County?

23 A No. I talked to him over the phone.

24 Q And when you were released, what was the reason for
25 your visit?

1 A To -- so I can -- my husband took me there to
2 introduce me to Dr. [REDACTED] since -- in person because I had only
3 talked to him over the phone.

4 Q Did you pay to talk to him over the phone? Did you
5 pay Dr. [REDACTED]

6 A My husband had been paying him.

7 Q And when your husband introduced him to you in early
8 March or April 2012, did you have a [REDACTED] with Dr.
9 [REDACTED]?

10 A He told me that I was very normal and very
11 outstanding.

12 Q Okay. When you went to see Dr. [REDACTED] three weeks ago,
13 what was the reason for that?

14 A When my -- I think my husband went there to discuss
15 -- I think my husband went to Dr. [REDACTED] to discuss about this
16 immigration and because he had a lot of stress due to this case
17 with Ms. Wall, and he took me and I went there to say hi.

18 Q So you have never seen Dr. [REDACTED] for a [REDACTED]
19 outside of one phone call at Irwin Detention; correct?

20 A That's right.

21 Q Look at paragraph or item number five, please. You
22 write in there that you received -- well, let's read from the
23 beginning. Correct me. This is what it says: During these
24 almost 24-hour trips, I received no medical attention, no food
25 and no water. Is that what it says?

1 A (In English) Yeah.

2 THE INTERPRETER: A Yes.

3 MS. WALL: Q Okay. Is that true?

4 A (In English) The no medical is true. The food
5 (inaudible) --

6 Q If you're talking in English --

7 A (In English) I'm sorry.

8 Q -- we can't understand you. I'm sorry.

9 A (In English) I'm sorry.

10 Q So I'm going to ask you my question, and answer
11 through your interpreter.

12 A (In English) Yeah.

13 Q Is that first sentence of number five true?

14 A Yes.

15 Q What medical attention did you need at that time?

16 A I need -- I needed [REDACTED].

17 Q And is it your testimony today that on ten different
18 occasions you took 24-hour trips and received no food and no
19 water on each of those trips?

20 A Yes, I almost didn't get any food, and the -- the
21 trips we took to Atlanta were four-hour drives in a bus that
22 didn't have any air-conditioning in 100-degree temperature, and
23 they didn't give us any water.

24 Q So look at number four. Do you see where you write
25 that you were transported on ten different occasions?

1 A (In English) 11 time, yeah.

2 THE INTERPRETER: A Yes. It actually --
3 actually, it was 11 times.

4 MS. WALL: Q Okay. Is it your testimony that
5 on 11 different trips you received no food.

6 A (In English) No. I -- not --

7 Q Talk through him.

8 A They had given me sandwich in 12:00 a.m., but I
9 didn't eat it, and they did give me water.

10 Q The next sentence says the temperature outside was
11 110 to 115 degrees. Do you see that?

12 A (In English) Yeah.

13 THE INTERPRETER: A Yes.

14 MS. WALL: Q How do you know what the
15 temperature was outside?

16 A (In English) I just know the -- the October, late
17 October. I just can feel it. I know -- I was just sweating
18 the bus, sweating, sweating, just on the bus. No
19 air conditioner, just sweating, just (inaudible) -- 11 times --
20 13 hours Irwin County to -- 13 hours Irwin County to Atlanta
21 (inaudible) --

22 Q She can't understand you. She's trying to transcribe
23 what you're saying, and she can't understand you. So my
24 question is this -- and I know you just answered me. Please
25 answer again through the interpreter. How do you know it was

1 110 to 115 degrees outside?

2 A I just felt -- I just felt with my body that it was
3 definitely over 100 degrees, and it was late October.

4 Q Do you see where you write that it was on July 7th,
5 2011 in number five?

6 A (In English) Yeah.

7 THE INTERPRETER: A Yes.

8 MS. WALL: Q So do you want to change your
9 answer about it being late October?

10 A I don't know if it was July or August, but I think it
11 was August. They had the air conditioner on for the drivers in
12 the front, but in the back, in the rear, there's no
13 air conditioners.

14 Q Was anybody else in the van with you?

15 A (In English) Yeah --

16 THE INTERPRETER: A Yes --

17 THE WITNESS: A (In English) -- several.

18 MS. WALL: Q Several other detainees?

19 A (In English) Yeah. Yeah.

20 THE INTERPRETER: A Yes.

21 MS. WALL: Q Look at number six, please. Do
22 you see where it says: On one occasion, an ICE renegade named
23 Settles threatened me with a gun as I was leaving a courtroom.
24 Do you see that sentence?

25 A (In English) Uh-huh.

1 Q What does -- what does renegade mean?

2 A What does that mean, renegade?

3 Q I'm asking you, Ms. Cho. You wrote this. What does
4 renegade mean?

5 A (In English) Renegade means -- what is your question,
6 Ms. Wall?

7 Q I'm sorry?

8 A (In English) What is your question for this --

9 Q Oh yeah. My question is, number six, you wrote that
10 an ICE renegade named Settles. What do you mean by the word
11 renegade?

12 A (In English) You know -- you know what is a renegade
13 mean is. You don't have to ask that; right?

14 Q I'm asking.

15 A (In English) You know, but you're asking me. You
16 know that. You know that.

17 Q I'm asking you what does that word mean. If you
18 don't know, you say I don't know. It's okay. But if you know,
19 then you tell me.

20 A (In English) I don't know how to answer correctly,
21 but I --

22 THE INTERPRETER: A I really don't know.

23 MS. WALL: Q Okay. Can you explain that
24 incident you describe in number six?

25 A Okay. So before we were going -- we were going up to

1 the second floor where the courtroom was and I had my hands and
2 feet tied or handcuffed, and at the time, my husband was
3 allowed to attend that hearing because the lawsuit that he had
4 filed, and I told the ICE agent about that saying that my
5 husband will be in the courtroom, and the agent looked at me
6 kind of in very disparaging way and asked me who allowed your
7 husband to be in the courtroom. And then he took out a gun
8 that was on the wall and kind of slowly started pointing it
9 from the ground towards the -- towards the ceiling very slowly
10 and slowly put it in his holster, all the time looking at me
11 very -- in a very threatening manner, and that's what this is
12 about.

13 Q About what date, if you remember, either the month or
14 the exact date, for number six?

15 A That was the first --

16 THE COURT REPORTER: Give me one second,
17 please. Sorry.

18 THE WITNESS: A That was the first time my
19 husband was allowed to come into the courtroom.

20 MS. WALL: Q Was that when he was with Ms.
21 Bonnie Youn?

22 A (In English) Yeah.

23 THE INTERPRETER: A Yes.

24 MS. WALL: Q And was that after he filed the
25 lawsuit that is right now pending?

1 A (In English) Yeah.

2 THE INTERPRETER: A Yes.

3 MS. WALL: Q And how did you know that that
4 ICE agent's name was Settles?

5 A (In English) I got from the other agent, the other
6 (inaudible) --

7 THE INTERPRETER: A I heard -- I heard that
8 from another ICE agent.

9 MS. WALL: Q Did you hear that from another
10 ICE agent on the same day that this happened?

11 A The next day because they come to Irwin County every
12 Friday, and my court date was Thursday.

13 Q So did the agent that is involved in the incident
14 with the gun come to Irwin County the next day?

15 A He doesn't come to Irwin County because he's not the
16 case manager.

17 Q So who told you that his name was Settles?

18 A (In English) His name is (inaudible) -- last name Mr.
19 Sutton.

20 THE INTERPRETER: A His name is Mr. Southern.

21 THE WITNESS: A (In English) Sutton, Mr.
22 Sutton.

23 THE INTERPRETER: A Sutton.

24 THE WITNESS: A (In English) Sutton.

25 MS. WALL: Q Southern.

1 A And other people also told me his name was Settle.

2 Q Did Mr. Southern tell you that the agent that had the
3 gun name was Mr. Settle?

4 A (In English) Yeah. Yeah.

5 THE INTERPRETER: A Yes.

6 MS. WALL: Q And did Mr. Southern see the
7 incident with Mr. Settle?

8 A He probably saw it. That's why he told me, and I
9 think he saw it because he was sitting in that chair at that
10 time.

11 Q What did Mr. Southern say to you when he was telling
12 you Mr. Settles' name?

13 A He said that that agent's name is Settles, and if you
14 have any complaints, then -- then sue him. When I explained to
15 him the incident, he -- he looked very concerned.

16 Q Do you know what Mr. Southern's first name is?

17 A No, because I only heard him be referred to as
18 Southern.

19 Q Okay. Look at number seven, please. Do you see it
20 says another ICE renegade again? Do you see that phrase? Can
21 you explain what that phrase means?

22 A I had just explained to my husband all the things
23 that I experienced, and he's the one who chose this word
24 renegade because -- and my husband had suffered a lot from ICE,
25 as well, and so that's why he used that word, I think.

1 Q Do you see where also in number seven you have in
2 quotes are you still here? You can seek voluntary departure
3 and return to the United States in three months. Do you see
4 where you wrote that in number seven? Who --

5 THE INTERPRETER: Go ahead. I'm sorry.

6 MS. WALL: Sorry. She was nodding her head
7 yes, so I thought she understood.

8 MS. WALL: Q Did you understand my question?

9 A (In English) Yeah.

10 THE INTERPRETER: A Yes.

11 MS. WALL: Q Okay. Who said that?

12 A Joe Azar had also mentioned that if I chose voluntary
13 departure that I should be released right away, and also the
14 case manager at Irwin had told me this, but later on I found
15 out that was not true.

16 Q So in number seven, you refer to the person who said
17 this as an ICE renegade; correct?

18 A (In English) Yeah.

19 THE INTERPRETER: A Yes.

20 MS. WALL: Q And when the -- I'm sorry were
21 you still answering?

22 A But later on we found out this was a lie.

23 Q Did you do anything as a result of that statement?

24 A Because I was -- I was detained for so longer and I
25 didn't know what to do I asked the judge that I would take the

1 voluntary departure, but he told me that don't do that, that I
2 need to get -- I needed to get the green card.

3 Q What judge was that?

4 A (In English) Pelletier.

5 THE INTERPRETER: A Pelletier.

6 MS. WALL: Q Pelletier, P-e-l-l-e-t-i-e-r,
7 correct?

8 A Yes. He told me that -- that it was time for me to
9 get the green card.

10 Q When did he tell you that?

11 A The tenth time that I went to the court.

12 Q Do you know what date that was?

13 A It might have been early February or January.

14 Q Of 2012?

15 THE INTERPRETER: (Interpreter nodding head.)

16 MS. WALL: Q Okay. Look at number eight. Do
17 you see where it says on May 15th Dan Jones refused medical
18 attention for six more months?

19 A What number did you say?

20 Q Number eight.

21 A Yes.

22 Q Is that a true statement?

23 A Yes.

24 Q What medical attention did Dan Jones refuse to give
25 you?

1 A The REDACTED refusing to give me REDACTED. Well,
2 the doctor told me that I needed to take that medication until
3 he stopped it.

4 Q When did the doctor stop it?

5 A So around March or April of 2000 was the -- the end
6 of the -- the time frame where I should have finished the
7 medication.

8 Q 2000 or 2012?

9 A (In English) 2012.

10 THE INTERPRETER: A 2012.

11 MS. WALL: Q But the last time you took the
12 medication was when you were still at the Irwin Detention;
13 right?

14 A No. After I was released -- after I was released, I
15 did take it for another three to four months.

16 THE WITNESS: A (In English) Four month, yeah.

17 MS. WALL: Q So who was your doctor during
18 that time?

19 A You're talking about the Irwin County doctor?

20 Q After you were released from Irwin County, who was
21 your doctor for three to four more months?

22 A I was able to get it on my own at Wal-Mart, and
23 Doctor -- after that was Dr. Hagenstad.

24 Q Which Wal-Mart did you use to fill your prescription?

25 A One there on Jebulon Road (sic).

1 Q On what road?

2 A Jebulon Road.

3 Q Is it Zebulon?

4 A (In English) Zebulon.

5 Q Z-e-b-u-l-o-n?

6 A (In English) Yes. Yes.

7 Q Look at number nine, please, next page. Do you see
8 where you write that Felicia Skinner conspired to deny you
9 medical attention?

10 A (In English) Yeah.

11 THE INTERPRETER: A Yes.

12 MS. WALL: Q Who did she conspire with?

13 A I don't know the other person's name.

14 Q Was it one other person?

15 A I think maybe two.

16 Q And what did they look like?

17 A My husband was the one who talked to Felicia Skinner
18 and the -- I think from what he had experienced he wrote this
19 sentence. I know Dan Jones because he came to Irwin County,
20 and I saw him, but I never seen Felicia Skinner.

21 THE WITNESS: A (In English) Dan Jones is a
22 ICE director.

23 THE INTERPRETER: A Dan Jones is a ICE
24 director.

25 MS. WALL: Q So did your husband write number

1 nine without information from you?

2 A Well, my -- well, my husband told me about them over
3 the phone, but -- but yeah, he told me about them, so I knew
4 about it.

5 Q But you don't have any knowledge on your own of the
6 facts that are in number nine; is that right?

7 A (In English) No. I have --

8 THE INTERPRETER: A I know this is the -- I
9 know that these were factual. Yes, I know that. I know that.

10 MS. WALL: Q Let me ask my question again. I'm
11 not asking whether it's true or not true. What I'm asking is
12 you don't know for yourself, but you know this information in
13 number nine because your husband told you that; correct?

14 A (In English) Yeah.

15 THE INTERPRETER: A Yes.

16 MS. WALL: Q Number ten --

17 A Well, ICE director and the case manager came to Irwin
18 County, so I saw them, so it's not that I didn't know anything
19 about it. I know about this.

20 Q How do you know that Felicia Skinner was involved?

21 A Because my husband told me about it.

22 Q Is it -- remind me -- strike that. I wrote it down.
23 Dr. Hagenstad is he with Suburban Hematology in Lawrenceville?

24 A (In English) Yes. Yeah.

25 Q Suburban Oncology?

1 A I think so.

2 Q And did you have appointments with Dr. Hagenstad at
3 Suburban Oncology after your release from Irwin Detention?

4 A Yes, once.

5 Q Look at number ten. Do you see where the second
6 sentence starts with further information?

7 A Yes.

8 Q Please read that sentence?

9 A (In English) Will be sent to you along with document
10 -- document received from Janet Napolitano --

11 Q Napolitano.

12 A -- and John Morton and other Office Professional
13 Responsibility --

14 Q Findings.

15 A -- findings.

16 Q Right? Okay. What further information -- well, let
17 me ask you -- strike that. Did you send any further
18 information?

19 A That's my understanding, but I am not positive.

20 Q Is that because your husband would have done it?

21 A (In English) No. No.

22 THE INTERPRETER: A We do everything together.
23 If he sends anything, he will consult -- he will talk to me
24 about it first, so I -- I believe he sent it.

25 MS. WALL: Q What was the information he sent?

1 What was the further information, which means more information,
2 that he sent?

3 A (In English) At this point, I don't remember.

4 THE INTERPRETER: A Yeah, I don't remember.

5 MS. WALL: Q And do you see where it says
6 documents received? What document -- I'm sorry. Did you --
7 Ms. Cho, do you see where you discuss in number ten that you
8 received some documents?

9 A (In English) Yeah, yeah.

10 Q Yes?

11 A (In English) Yes.

12 Q What documents did you receive?

13 A (In English) I don't remember. Got some, but I don't
14 remember, at this point.

15 THE INTERPRETER: A I don't remember at this
16 point. I'm sorry.

17 MS. WALL: Q Do you remember receiving
18 documents from Office of Professional Responsibility?

19 A Yes, we received some kind of notice saying that the
20 case is dismissed but that if you wanted to sue again, then we
21 had six months to do it.

22 Q Okay. That -- is that the letter that you received
23 that is the next page?

24 A (In English) Yes. Yes.

25 THE INTERPRETER: A Yes.

1 MS. WALL: Q So I'm not talking about what you
2 received from Mr. Brodsky. This letter that we're looking at
3 is you're sending it to Mr. Brodsky. So I'm asking you if you
4 received documents from Janet Napolitano, John Morton and other
5 Office of Professional Responsibility findings? Did you
6 receive anything like that?

7 A (In English) Yeah, John Morton -- John Morton, I did.

8 THE INTERPRETER: A We did receive something
9 from John Morton. That's the only thing I remember.

10 MS. WALL: Q And would that be at home?

11 A Yes.

12 Q At your friend's house?

13 A I have them.

14 Q You're living with your friend right now; right?

15 A (In English) Yeah.

16 THE INTERPRETER: A Yes.

17 MS. WALL: Q Let's look at the summary. The
18 first sentence says I was assaulted by an out of control ICE
19 agency that cannot perform in any competent manner whatsoever.
20 When you write this summary, what do you mean by the word
21 assaulted there?

22 A What I meant by the assault is one time I fell inside
23 the bus. Whether I was pushed or not, I can't -- I don't -- I
24 don't know, and that was one time, and the other time is that
25 gun assault that I mentioned before.

1 Q Were you pushed inside the bus -- let me take that
2 back. Did you fall inside the bus?

3 A I almost fell off the stairs in the bus.

4 Q So you did not fall; is that right?

5 A Almost fell, so it's probably same as falling.

6 Q So you did fall --

7 A (In English) Yeah.

8 Q -- inside the bus?

9 A (In English) Yeah. Yeah.

10 THE INTERPRETER: A Yes.

11 MS. WALL: Q But you don't know if you tripped
12 or if someone pushed you; is that what you said?

13 A Yeah, I'm not sure.

14 Q The next sentence says you received sometimes
15 inhumane treatment, irresponsible actions and reckless
16 treatment. Do you see that?

17 A (In English) Yeah.

18 THE INTERPRETER: A Yes.

19 MS. WALL: Q Please describe the inhumane
20 treatment.

21 A Well, first thing is, when we have to go to Atlanta
22 court, we are awakened at 12:00 a.m., and then we're given a
23 sandwich, and we finally depart from Irwin Detention Center at
24 around 3:00 a.m., and then we get to Atlanta. We arrive in
25 Atlanta around 6:00, 6:30 in the morning, and we are held in a

1 holding cell until 1 o'clock, and it's very, very cold in the
2 holding cell, maybe 20, 30 degrees. And the bathroom -- and
3 bathrooms are not private, and the tissues are kind of all
4 accumulated this high, so we have to kind of clean it ourselves
5 and it's so cold until 1:00 p.m.

6 Q Is that --

7 A Because court is usually held at 1 o'clock. And
8 after the hearing is over, we are brought back to the holding
9 cell, and we have to wait until 6:00 p.m.

10 Q Okay. Thank you. The next phrase is irresponsible
11 actions. Can you describe that?

12 A Could you repeat the question?

13 Q What do you mean by irresponsible actions in that
14 paragraph?

15 A Where does it say that?

16 Q You just read it to me, right after inhumane
17 treatment. I'll show -- let me point to you: Inhumane
18 treatment, irresponsible actions and reckless treatment. I'm
19 trying to understand what you mean by --

20 A (In English) Well --

21 Q -- let me finish, please. I'm trying to understand
22 what you mean by the three different phrases: Inhumane
23 treatment, irresponsible actions and reckless treatment.

24 A (In English) Okay. Thank you.

25 THE INTERPRETER: A Well, the deportation

1 manager comes every Friday, once a week, but my case manager
2 wouldn't come not even once a month, when other -- for other
3 people, their case managers come once a week. So that's very
4 irresponsible. And when she does come, when I try to talk to
5 her, she wouldn't give me a chance to talk. She would just
6 stay maybe one or two minutes, and when I try to hold her -- I
7 hold like this and try to hold her so I can tell her things,
8 she would claim that I assaulted her, and I was put in
9 isolation for like a month.

10 MS. WALL: Q Do you know what that person's
11 name is?

12 A (In English) Arabi.

13 THE INTERPRETER: A Arabi.

14 THE WITNESS: A (In English) Last name is -- I
15 don't know Arabi's last name.

16 THE INTERPRETER: A Arabi is the last.

17 MS. WALL: Q Is that A-r-a-b-i?

18 A I think so.

19 Q Okay. And then reckless treatment, what do you mean
20 by that?

21 A One second, please.

22 Q Do want to -- do you need to take a break, Ms. Cho?

23 A (In English) Yes.

24 Q Okay. Go ahead, please.

25 A (In English) Thank you.

1 MS. WALL: Let's take five minutes, okay?

2 THE WITNESS: (In English) Yeah.

3 (SHORT BREAK)

4 MS. WALL: Q Ms. Cho, are you ready?

5 A (In English) Yes. Yes, I'm ready.

6 Q Let me just remind you you're still under oath. I
7 think the question that I had asked before we took a break --
8 I'm sorry. You answered the question about the irresponsible
9 actions.

10 A (In English) I want to say some more.

11 Q Oh, you want to answer some more about that.

12 A (In English) Yeah.

13 Q Okay. Go ahead.

14 A (In English) Thank you.

15 THE INTERPRETER: A And you know, when the
16 case manager doesn't come as often as -- doesn't come, then I
17 would tell my husband, and my husband would call the case
18 manager and would request a return, and -- and they wouldn't
19 pick up. They just don't pick up when the husband calls, and
20 when he leaves a message, then they don't return the call, and
21 even when the attorneys, those three or four attorneys would
22 call them -- call him or her countlessly -- countless times but
23 would not return the calls for three -- three or four weeks.

24 MS. WALL: Q And that is based on information
25 given to you by your husband; right?

1 A (In English) Yeah.

2 THE INTERPRETER: A Yes.

3 MS. WALL: Q What do you mean by -- or what is
4 it that you're saying -- strike that.

5 A And I also heard -- heard that from the attorneys
6 that they don't return the calls.

7 Q What attorneys?

8 A Schwartz and Azar, Joe Azar, they told me when I
9 talked to them over the phone, and I asked them about it, and
10 they say the case manager does not return their calls.

11 Q And what do you mean by the next phrase reckless
12 treatment, if it is different from inhumane or irresponsible
13 actions?

14 A I'm not sure. I'm kind of tired, and I can't really
15 remember it very clear.

16 Q Okay. I'm just going to ask you a few more questions
17 about this document, and then we can stop for the day and
18 reschedule. Would that be helpful to you?

19 A (In English) Yeah.

20 THE INTERPRETER: A Yes.

21 MS. WALL: Q The next line refers to inside
22 pending lawsuits by agents to their superiors. Do you see
23 that?

24 A (In English) Yeah.

25 THE INTERPRETER: A Yes.

1 MS. WALL: Q What do you mean by that?

2 A This is regarding our case since me and my husband
3 have been married. My husband is a citizen. Can you repeat
4 the question?

5 Q What this says is there are inside pending lawsuits
6 by agents to their superiors; right?

7 A I'm not sure.

8 Q Do you --

9 A (In English) I'm sorry.

10 THE INTERPRETER: A We're just trying to say
11 there is a lot of problems inside the ICE. There are a lot of
12 cases -- a lot of cases where ICE agents sue their supervisors,
13 and there are cases where agents are suing each other for
14 gunshots, you know, that cause death and all that stuff.
15 That's what it's referring to.

16 MS. WALL: Q Can you give me an example of any
17 of them?

18 A About five months -- about five months before I got
19 released from Irwin County, there was an incident in L.A. where
20 agents shot --

21 THE WITNESS: A (In English) ICE agents,
22 uh-huh.

23 THE INTERPRETER: A -- ICE agents shot other
24 agents and two of them died.

25 MS. WALL: Q Any others?

1 A I think that's all. I'm not sure.

2 Q Turn to the next to the last page. In the second
3 paragraph, you write: I was held illegally by ICE for almost a
4 year in 2011 while I fought [REDACTED] in the same time frame. Is
5 that true?

6 A (In English) Yeah.

7 THE INTERPRETER: A Yes.

8 MS. WALL: Q Were you fighting [REDACTED] in 2011?

9 A I wasn't fighting [REDACTED], but I was supposed to
10 continue to take medication per doctor's instruction, and
11 that's what I believe I was supposed to do, and that's what
12 it's referring to, and so that's same thing as fighting [REDACTED]
13 because you need to make -- you -- part of fighting [REDACTED] is
14 to finish taking medication to terminate it completely.

15 Q So Ms. Cho, I understand you're telling me you're
16 tired, and I understand that.

17 A (In English) I'm sorry.

18 Q That's okay. It's 3:40 right now. We can stop the
19 deposition for now.

20 A (In English) Actually, I'm okay now. I'm okay now.

21 Q Do you want to keep going?

22 A (In English) Yeah, I'm okay now. You said 5 o'clock,
23 if you want --

24 Q Did you -- have you made any phone calls today since
25 we've been in the deposition?

1 A (In English) No, I don't have even cell phone here
2 because they didn't let me have here today.

3 Q Okay.

4 A You said 5 o'clock. I don't mind we stay 5 o'clock,
5 if you would like to.

6 Q Okay. Well, I don't think we're going to be done by
7 5 o'clock. We're going to have to come back anyway. Would you
8 like to go ahead and stop and come back, or do you just want to
9 keep going right now?

10 A (In English) What is your (inaudible) --

11 Q Either one, we're going to have to come back twice
12 anyway.

13 A (In English) Okay.

14 Q So if you're tired, then we can stop.

15 A (In English) Okay.

16 Q So let me tell you what we're going to do. I still
17 have more questions to ask you about your complaint and about
18 your husband's complaint. Let me ask you some quick questions,
19 though. Have you ever filed for bankruptcy?

20 A I think my husband filed it once.

21 THE WITNESS: A (In English) I -- I don't
22 know. I'm not sure.

23 THE INTERPRETER: A I don't know. I'm not
24 sure.

25 THE WITNESS: A (In English) He might not.

1 I'm sorry.

2 THE INTERPRETER: A He might not. I'm sorry.

3 MS. WALL: Q But have you ever filed for
4 bankruptcy?

5 A No.

6 Q And if your husband filed for bankruptcy, he did not
7 include you in it; correct?

8 A That's correct.

9 Q And if he did include you in the bankruptcy, you
10 don't know about it?

11 A That's right.

12 Q Do you know someone by the name of Everitt Howe?

13 A No.

14 MS. WALL: For the court reporter, it's
15 E-v-e-r-i-t-t Howe, H-o-w-e.

16 MS. WALL: Q Your husband was allowed to sit
17 with you during your first immigration hearing; right?

18 A (In English) Yeah.

19 THE INTERPRETER: A Yes. Yes.

20 MS. WALL: Q And that was Judge Cassidy;
21 right?

22 A (In English) Yeah.

23 THE INTERPRETER: A Yes.

24 MS. WALL: Q Did you bring anything with you
25 today?

1 A Not really, no, no document.

2 THE WITNESS: A (In English) No paper, no --
3 no pens or -- just -- you know, just sitting.

4 MS. WALL: Q Okay. I was asking for
5 documents. Did you bring any documents?

6 A (In English) No.

7 Q Do you receive any disability payments?

8 A No.

9 Q Do you receive any Social Security payments?

10 A No.

11 Q Does your husband receive any disability payments?

12 A No.

13 Q Does your husband receive any other government
14 payments?

15 A (In English) Social.

16 THE INTERPRETER: A Social.

17 MS. WALL: Q Social Security?

18 A Yes.

19 Q So does your husband receive Social Security?

20 A Yes.

21 Q How much does he get?

22 A (In English) \$700.

23 THE INTERPRETER: A \$700.

24 MS. WALL: Q Per month?

25 A (In English) Per month.

1 THE INTERPRETER: A Per month.

2 MS. WALL: Q And does he receive any other
3 money from any other source?

4 A Like I mentioned, he does help out at church
5 sometimes and he gets some money from them. And when there is
6 -- when he's needed, he does do some landscaping but not that
7 much. He can't do anything because of this lawsuit.

8 Q Can you explain that?

9 A Because he's trying to handle this lawsuit on his own
10 without hiring an attorney, he spends a lot of time and a lot
11 -- a lot of effort in the -- for the lawsuit. And although he
12 can have -- he can do a lot of things like mortgage, work in
13 mortgaging and car sales, maybe, but because he has to spend so
14 much time and effort in this lawsuit exchanging information
15 with Ms. Wall, et cetera, he can't do anything.

16 Q Is it your testimony that your husband can't work
17 because he's handling this lawsuit?

18 A Yes. Currently, yes.

19 Q Does he get money from Social Security for a
20 disability?

21 A No. Because his age, he's 63.

22 Q Does your husband have any disabilities?

23 A (In English) No.

24 THE INTERPRETER: A No.

25 MS. WALL: Q Do you have any disabilities?

1 A (In English) No.

2 THE INTERPRETER: A No.

3 MS. WALL: Q Have you ever applied --

4 A (In English) I have -- I'm sorry. I have disability,
5 but I didn't have green card so many years. I didn't want to go
6 to work. But yeah, I didn't actually work. I wasn't happy,
7 actually. I was not (inaudible) --

8 Q You have to talk to her in English over here at the
9 court reporter --

10 A (In English) I'm sorry.

11 Q -- or talk to your interpreter.

12 A Because I had no green card, I couldn't work, and if
13 I do work for a short time, because I don't have a green card,
14 I -- I fall into despair. And the last time I had a disability
15 was the REDACTED, and hopefully, I don't have any more
16 disabilities.

17 Q Did you ever make a disability claim with anyone?

18 A No, I never thought about it. I am in a -- I -- I am
19 suffering because I cannot have kids because my other doctor
20 told me that I cannot have children. I should not have
21 children. And my REDACTED is due to green card.

22 Q Do you know -- strike that. Have you had a doctor or
23 any professional tell you that your green card issues was the
24 cause for your REDACTED?

25 A Dr. Hagenstad knew later that I was suffering because

1 of the problem with the green card. But can you repeat the
2 question?

3 Q Yes. Let me make it clear, and I'm going to ask you
4 more than one question.

5 A (In English) That's fine.

6 Q Is it your testimony today that your green card
7 problems caused your REDACTED ?

8 A Yes.

9 Q Who told you that?

10 A I -- I told myself. So I told you before in the
11 interview I had with the Immigration in 2004 they told me that
12 they would send a green card within two weeks, but I didn't get
13 it. And a year later -- I didn't get it -- get it for a year.
14 And later I tried to find out what's going on and in Hawaii and
15 through an attorney, but they wanted \$7,000, and they also said
16 that they contacted the Immigration, and they couldn't find my
17 file, period. So after hearing that, one year later, I was
18 diagnosed with REDACTED and REDACTED .

19 Q But who told you that it was -- strike that. Have
20 you ever had a medical person or provider tell you that your
21 issues with the green card can cause REDACTED ?

22 A No. No. I told them that I thought that was the
23 reason, but I didn't hear that from any doctor or medical
24 person. But before I actually got the green card, I -- I -- I
25 never, not even for one day, able to breathe comfortably.

1 Q Who did you tell that to, when you said --

2 MS. WALL: Let me just finish.

3 THE INTERPRETER: Yeah.

4 MS. WALL: Q You said I told them that's what
5 I thought, but I did not hear back? Who is "them?"

6 A About the green card?

7 Q Causing [REDACTED] -- about the green card causing your
8 [REDACTED] who did you tell that to?

9 A I told Judge Pelletier.

10 Q Okay. Do you have any family history of [REDACTED]
11 [REDACTED]?

12 A (In English) My mother.

13 THE INTERPRETER: A My mother.

14 THE WITNESS: A (In English) My aunt. Yeah,
15 they do. But they have a -- we have a very different --

16 THE INTERPRETER: A My mother and my aunt but
17 we had complete different lifestyle. I'm a person that can
18 swim four hours straight without a break and also play tennis,
19 and I have a deep Christian faith and a very happy personality.
20 So if I did get [REDACTED], it would have been a lot later
21 in life, not at this age.

22 MS. WALL: Q What age was your mom when she
23 was diagnosed with [REDACTED]

24 A 60.

25 Q Not 48?

1 A (In English) No. No.

2 THE INTERPRETER: A No.

3 MS. WALL: Q What about your aunt?

4 A I'm not -- I'm not sure about when for her.

5 Q How old were you when you were diagnosed with [REDACTED]

6 [REDACTED]

7 A 43.

8 THE COURT REPORTER: Did he say 43?

9 THE INTERPRETER: (Interpreter nodding head)

10 MS. WALL: Q How much did you pay Dr. Kerr for
11 your conversation with him from the detention center?

12 A I'm not sure exactly, but I think my husband said he
13 paid like 300 or 500, and even now we have a lot of debt.

14 Q Besides Dr. Kerr, have you talked to any other
15 psychologist?

16 A (In English) No. No.

17 THE INTERPRETER: A No.

18 MS. WALL: Q Have you ever taken any
19 medications for mental health reasons?

20 A (In English) No.

21 THE INTERPRETER: A No.

22 MS. WALL: Q The surgery -- how many surgeries
23 have you had in your life?

24 A This was the first time.

25 Q Is that the only surgery you've had is your [REDACTED]

1 surgery?

2 A (In English) Yeah. Yeah.

3 THE INTERPRETER: A Yes.

4 MS. WALL: Q And is that a [REDACTED] REDACTED ?

5 A (In English) Yeah. Uh-huh. Yeah.

6 THE INTERPRETER: A Yes.

7 MS. WALL: Q You said you were in Gwinnett

8 County Detention Center when ICE picked you up; right?

9 A (In English) Yeah.

10 THE INTERPRETER: A Yes.

11 MS. WALL: Q Why were you there?

12 A Due to shoplifting charge.

13 THE WITNESS: A (In English) There is a
14 probation violation. I -- yeah. Yeah.

15 THE INTERPRETER: A And probation violation.

16 MS. WALL: Q I'm going to show you what I've
17 marked as Exhibit 6. Is that your handwriting? Is that your
18 handwriting?

19 A It doesn't look like it.

20 Q Okay. Does that look like your husband's
21 handwriting?

22 A Yes, I think so.

23 Q That looks like your husband's handwriting?

24 A Yes.

25 Q Okay. How many convictions have you had for

1 shoplifting?

2 A (In English) Seven, eight. Seven -- seven -- seven,
3 yeah.

4 THE INTERPRETER: Seven?

5 THE WITNESS: (In English) Yeah.

6 MS. WALL: Q And other than those seven
7 shoplifting convictions, have you ever been arrested for
8 anything else?

9 A (In English) No. No.

10 THE INTERPRETER: A No.

11 THE WITNESS: A After the [REDACTED] surgery, at
12 the start of my [REDACTED], I just wasn't myself mentally
13 when I first started the very intense [REDACTED].

14 MS. WALL: Q Were all of those convictions in
15 Georgia?

16 A (In English) Yeah. Yeah. Yeah. Yes.

17 THE INTERPRETER: A Yes.

18 MS. WALL: Q As -- were you still answering?
19 Sorry.

20 A Some of them are falsely accused.

21 Q So were you --

22 A (In English) Falsely accused, yes.

23 Q Falsely accused. So how many times did you plead
24 guilty to shoplifting?

25 A All those seven times but they told me, since I

1 didn't have a green card, that just -- they told me to just
2 plead guilty, and -- and they held me in detention for a long
3 time, and they treated me very differently than other inmates.

4 Q Who told -- I'm going to ask you questions about your
5 answer. Who told you to plead guilty because you didn't have a
6 green card?

7 A The judge, he told me I was -- he -- he kind of treat
8 me very kind of differently and very dismissingly and wouldn't
9 let me talk and kind of made me very scared. He told me I was
10 illegal and wouldn't let me talk, wouldn't let me explain
11 myself, and he had them bring false evidence and, you know,
12 very -- treat me very differently than other people.

13 Q Who -- what judge is that?

14 A (In English) Karen E. Beyers.

15 THE INTERPRETER: A Karen --

16 THE WITNESS: A (In English) Karen E. Beyers.

17 THE INTERPRETER: A Karen E. Beyers.

18 MS. WALL: Q What court is that?

19 A (In English) This was Superior Court.

20 Q Superior Court?

21 A (In English) Superior Court. This is -- I have a one
22 -- now I don't have any conviction. They gave me the green
23 card. They -- they erased my record all up.

24 Q You're saying they erased your record when you got
25 your green card?

1 A (In English) They -- they did.

2 Q No. I'm asking is that what you just said in English
3 that they erased my record when they gave me the green card?

4 A That's what I know.

5 Q Okay. So Superior Court judge in what county?

6 A (In English) Gwinnett County.

7 Q Gwinnett County. Are all of your convictions in
8 Gwinnett County?

9 A Two of them were in Macon.

10 Q And the judge that you're saying, Karen E. Byers --

11 A (In English) Karen E. Beyers.

12 Q -- was that judge Superior Court Gwinnett County?

13 A (In English) Yeah.

14 THE INTERPRETER: A Yes.

15 MS. WALL: Q And you said she allowed false
16 evidence against you?

17 A (In English) She did. She did. She did.

18 THE INTERPRETER: A She did.

19 MS. WALL: Q Okay. How many of the seven
20 convictions were you innocent?

21 THE INTERPRETER: Interpreter needs to
22 look up the word. I'm having a mental block.

23 THE WITNESS: A (In English) Could you --

24 MS. WALL: Q We have to let him ask you the
25 question. I asked you how many of the seven convictions you

1 were innocent. I asked you how many -- excuse me, Ms. Cho.

2 I'm to interrupt you. I want a number --

3 A (In English) Yeah.

4 Q -- just one number.

5 A (In English) Yeah.

6 Q Of the seven convictions --

7 A (In English) Yeah.

8 Q -- how many were you innocent? Ms. Cho, you're
9 talking to your interpreter. This is the second time.

10 A (In English) Okay. Okay.

11 Q And you're talking to him for minutes at a time. I'm
12 asking for a number. Of the seven, how many were you innocent,
13 and then you can explain, but please --

14 A (In English) Seven times all innocent.

15 Q -- give me a number.

16 A I think all seven times I was innocent.

17 Q Do you recall telling the immigration judge that you
18 were sorry for committing the shoplifting?

19 A (In English) Yeah, I did. Uh-huh.

20 Q Why did you say that if you were innocent?

21 A (In English) I was just --

22 THE INTERPRETER: A Because I wanted to kind
23 of convince the judge, explain myself, and since I was brought
24 from Gwinnett County with those charges, I was just trying to
25 move his mind, get his sympathy.

1 MS. WALL: Q Did you lie to him?

2 A Because I'm kind of innocent. Well, since I was
3 brought here from Gwinnett County -- and it wasn't really a
4 lie, but I mean it's such a -- such a -- such a, you know, hard
5 situation. I was having a hard time at the detention center.
6 I just wanted to move judge's mind.

7 Q Is it your testimony that you were innocent but you
8 pleaded guilty anyway?

9 A (In English) Yeah.

10 THE INTERPRETER: A Yes.

11 MS. WALL: Q And is it your testimony that
12 when you told Judge Cassidy and Judge Pelletier in Immigration
13 Court that you committed all of the shoplifting because you
14 were undergoing REDACTED was that a lie?

15 A No. Those are true.

16 Q So you did commit the shoplifting? You did -- you
17 were guilty of shoplifting?

18 A Yes.

19 Q You said you were innocent. Let me explain -- let me
20 explain to you if you're having a hard time understanding. You
21 just told me that you did not do any shoplifting; correct?

22 A (In English) No. I did shoplifting, but I'm --
23 shoplifting --

24 THE INTERPRETER: A I did commit all the
25 shoplifting, but if you look into my background, you'll see

1 that I wasn't arrested once before the REDACTED started,
2 and they could see that I suffer a lot because the Immigration
3 problem.

4 MS. WALL: Q You testified just now that a
5 judge named Karen E. Beyers allowed false evidence and made you
6 plead guilty --

7 A (In English) Yes, she did.

8 Q -- correct?

9 A (In English) She did. .

10 Q Were you guilty of stealing? Did you steal? I'm
11 sorry. Did you steal seven times? Let me -- let me rephrase
12 that.

13 THE INTERPRETER: I'm sorry.

14 MS. WALL: Q Sorry. Did you steal every time
15 you were charged with shoplifting?

16 A (In English) Yeah, I did.

17 THE INTERPRETER: A I did.

18 MS. WALL: Q Okay. So you were not innocent;
19 correct?

20 A If you look at that face value, I was not innocent.

21 Q I don't understand. If you want to, you can explain
22 to me. But when you plead guilty, what that tells me is that
23 you did commit the crime. So I'm asking you now, to allow you
24 to clarify, did you commit shoplifting all seven times that you
25 were convicted of committing shoplifting?

1 A (In English) Yeah.

2 THE INTERPRETER: A Yes.

3 MS. WALL: Q Look at Exhibit 8 again. You
4 have it in front of you, Page 3, at the bottom, Page 3. Can
5 you explain what you mean? It's the last paragraph. It starts
6 with I apologize for my action in your court? Do you see that?

7 A (In English) Yeah. Okay. Okay. I remember this
8 time.

9 Q The next sentence says: I could not resist, touched
10 my husband hand, such a long separation. What are you talking
11 about?

12 A This is the first time I've seen my husband for a
13 long time due to my detention, and when -- and at the court
14 hearing, my husband had drove from Macon to Atlanta, and in the
15 hallway, of course, well, you get to come close to each other.
16 And my husband, while he was saying, hi, Stephanie, at the same
17 time, he just kind of rubbed the top of my hand, and -- but
18 they made this big thing out of it.

19 Q Who made a big thing out of it?

20 A And also Judge Cassidy said that my husband insulted
21 ICE, and that's why that he's not going to allow him in the
22 court. Can you tell me what -- what you want to know here?
23 I'm not sure.

24 Q What date was it that your -- that you touched -- or
25 that your husband touched you?

1 A The first hearing that we had.

2 Q This is the hearing where Judge Cassidy let your
3 husband sit next to you; correct?

4 A (In English) It was the second hearing.

5 THE INTERPRETER: A I'm sorry. This is the
6 second hearing.

7 MS. WALL: Q So second hearing, when your
8 husband touched you and the ICE agents told him not to touch
9 you, what did your husband say?

10 A He didn't say anything. He just smiled and backed
11 away.

12 Q And then what happened?

13 A And I went into the courtroom, and -- but my husband
14 didn't come in. So I was wondering why, and later on I found
15 out they had escorted him out of the building.

16 Q Do you think that maybe your husband may have gotten
17 angry with them?

18 A You're saying he got angry because of that incident?

19 Q I'm asking if -- do you know whether your husband
20 acted angrily towards the agent?

21 A I don't know because I wasn't there.

22 Q Could you hear anything inside the courtroom
23 happening outside in the hallway?

24 A No, I didn't hear -- I didn't hear anything at all,
25 but since I know my husband and he wouldn't have said anything

1 while being escorted out. He would not have, you know, acted
2 out or said anything or, you know, tried to resist being
3 escorted out or anything like that.

4 Q Do you have any pending criminal charges against you?

5 A No.

6 Q Do you know if there's any investigations ongoing
7 related to you?

8 A No.

9 Q Do you know if your husband has any criminal charges
10 against him currently pending?

11 A No.

12 Q Do you know if there's any investigations currently
13 pending for your husband?

14 A No, I don't think there is.

15 Q Has your husband ever been arrested?

16 A Only time that I know is that incident with my
17 younger brother in Atlanta. Besides that, I don't think so.

18 Q Was he convicted?

19 A No. It got dismissed. Can I add one more thing?

20 Q Sure.

21 A Like I said, the shoplifting was really to my surgery
22 and the problems I was experiencing with the green card. And
23 as you know, in Gwinnett County, they kind of -- they hold you
24 and they kind of make you, force you to admit to charges, and
25 they -- it's true that they brought false evidence when they

1 were accusing me. And there is a very famous psychiatric
2 doctor that says when a woman has REDACTED
3 surgery, REDACTED, that there is a change in --
4 on their brain that causes them to shoplift. And he's a very
5 famous German psychologist.

6 Q I'm not talking about the reason for your
7 shoplifting. My question is -- you are going back and forth
8 between two different answers. I want a clear answer for the
9 record, because if we have too many different answers, nobody
10 knows the truth.

11 A (In English) Okay.

12 Q I want to know from you if you committed shoplifting,
13 and then you were convicted for committing the crime of
14 shoplifting, then why are you saying that they were false
15 evidence against you?

16 A In the beginning, I pled not guilty, and the judge
17 send me back to the jail and had me come back in two, three
18 weeks. And the attorney, when I came back -- and the attorney
19 presented pictures of five shoes that -- saying that I stole
20 those, but I had only stolen two shoes at the Neiman Marcus
21 shoes. They -- they cost about \$150. And -- and the judge,
22 when I said I didn't -- I pled guilty, he -- he didn't like me.
23 He was very angry and sent me back up to the jail for two,
24 three weeks. And it seemed like if I just said I did it it
25 seemed like I would be released right away. So I admitted it,

1 and I admitted using the first offender. This was first
2 offender. Then you don't have any record.

3 Q And then you had six more?

4 A (In English) Yeah.

5 THE INTERPRETER: A Yes.

6 MS. WALL: Q So let's stop for now. Are you
7 available, Ms. Cho, to continue the deposition on December
8 31st?

9 A I don't know right now. Can I get back to you? I
10 just don't know what my schedule is going to be.

11 Q So do you have my phone number?

12 A (In English) I haven't. Could I have one, please?

13 Q It's on the --

14 A (In English) I don't have a pen.

15 Q Here, would you -- I'll write down my phone number
16 for you. Please call me on Monday.

17 A (In English) You call me. You call me. I'll answer.

18 Q I don't know when you're going to look at your
19 schedule, so I want you to look at your schedule and you can
20 call my office anytime over the weekend and leave a message on
21 my voicemail. I'm going to give you my direct number.

22 A (In English) Okay.

23 Q I'm going to write it down for you, and I'd like for
24 you to leave me a voicemail and tell me if December 31st, 2013
25 at 10:00 a.m. will work for you at this courthouse in Macon --

1 A (In English) December 31.

2 Q -- okay?

3 A (In English) Okay.

4 Q I'm going to write that down for you, and I want you
5 to leave me a voicemail to tell me if that will work.

6 A (In English) Okay.

7 Q If it does not work, then you leave me your phone
8 number --

9 A (In English) Okay.

10 Q -- to call you back. And I need to know as soon as
11 possible because we have to hire the interpreter again, and he
12 has to be available.

13 A (In English) Okay.

14 Q So the phone number I'm giving you is (706)649-7731,
15 and I'm writing on this piece of paper the date December 31,
16 2013, 10:00 a.m., and I'm writing a note under it that says
17 leave me message to let me know if this date and time works to
18 continue your deposition; okay? Do you understand that?

19 A (In English) Okay.

20 Q Do you need the interpreter to tell you?

21 A (In English) No. I understand.

22 Q You understand that.

23 A (In English) Can I -- can I ask one more time. I'm
24 sorry. I --

25 Q Wait. We need to go back on the record.

1 THE COURT REPORTER: I'm on.

2 MS. WALL: Q You understand you're still under
3 oath, Ms. Cho?

4 A (In English) Okay.

5 Q Go ahead.

6 A I just want to ask -- I -- I just want to ask that if
7 I'm such a bad person then why did you guys issue the green
8 card in such a hurry, and why would I ask for to be deported so
9 many times, and I just don't want -- want the shoplifting
10 incident mentioned anymore.

11 Q If you're asking me why you were issued a green card,
12 Ms. Cho, I don't know. I'm an attorney for Department of
13 Justice. I never called you a bad person, and I don't -- I'm
14 not saying you're a bad person.

15 A (In English) Actually, I'm very (inaudible) --
16 actually --

17 Q You have to let me finish. Please stop interrupting.
18 And she can't understand you when we're talking at the same
19 time. So I'm not sure if you're asking me a question. And in
20 a deposition, really, I don't answer questions. The witness
21 does. But I understand that you're telling me that you feel
22 bad and you want to tell me that you're not a bad person. And
23 I'm saying to you I'm not accusing you of being a bad person --

24 A (In English) Okay.

25 Q -- okay? So I don't know why they issued the green

1 card or why they did not issue a green card, and those
2 immigration matters are unrelated to this lawsuit. Do you
3 understand that?

4 MS. WALL: Would you explain that to her?

5 THE INTERPRETER: (Interpreter complies)

6 MS. WALL: Q And let me add that the only
7 knowledge I have that you have any concerns with the
8 Immigration matters comes from your complaint and comes from
9 your legal documents. When you file those, that's the first
10 time I heard about you.

11 A Is that it?

12 Q Yes. Are you done? Were you done?

13 A (In English) Yeah, done. I'm done.

14 Q You're done?

15 A (In English) Yes.

16 Q Well, thank you very much, and we'll see you -- well,
17 we'll see you either on December 31st, or you will call and
18 schedule a different date.

19 A (In English) Okay. I'm sorry. I usually have -- I
20 know my schedule (inaudible) -- I'm in and out today.

21 Q Okay.

22 A (In English) Honestly, I can tell you in the next ten
23 days --

24 Q That's okay.

25 A -- give you a call.

1 Q That's perfectly fine. You just need to let me know
2 as soon as possible because we have to schedule them and book
3 the court.

4 A (In English) Hand shake, yeah.

5 Q Thank you very much.

6 A (In English) Thank you.

7 (DEPOSITION SUSPENDED AT APPROXIMATELY 4:35 P.M.)
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CERTIFICATE OF REPORTER

GEORGIA, BIBB COUNTY

I, Janice B. Keene, Georgia Certified Court Reporter B-2336, certify that the foregoing transcript was reported, as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages 1 through 142 represent a true, complete, and correct transcript of the evidence given upon said hearing, and I further certify that I am not kin or counsel to the parties in this case, am not in the employ of counsel for any of said parties, nor am I in anyway interested in the result of said case.

Disclosure pursuant to OCGA 9-11-28 (d):

The party taking this deposition will receive the original and one copy based on our standard and customary per-page charges. Copies to other parties will be furnished at our standard and customary per-page charges for copies. Incidental direct expenses of production may be added to either party where applicable.

WITNESS MY OFFICIAL SEAL and signature, this 9th day of January 2014.

Georgia Certified Court Reporter B-2336

DEPONENT'S SIGNATURE PAGE AND ERRATA SHEET

_____ COUNTY, GEORGIA:

I DO HEREBY CERTIFY that I have read the transcript of my testimony on pages 1 through 145 thereof, and wish to make the following corrections:

<u>PAGE/LINE</u>	<u>CORRECTION/REASON</u>
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This the ____ day of _____, 2014.

Dae Eek Cho

Sworn to and subscribed before me,
This ____ day of _____, 2014.

Notary Public